



**CORRESPONDENCE COVER SHEET
WASTE PERMITS DIVISION
TEXAS COMMISSION ON ENVIRONMENTAL QUALITY**

Date: 30 January 2024
Facility Name: Calaveras Plant Site
Permit or Registration No.: CCR102

Nature of Correspondence:
☒ Initial/New
☐ Response/Revision*

*If Response/Revision, please provide previous TCEQ Tracking No.:
(Previous TCEQ Tracking No. can be found in the Subject line of the TCEQ's response letter to your original submittal.)

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Table 1 - Municipal Solid Waste

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New Notification	<input type="checkbox"/> Closure Report
<input type="checkbox"/> New Permit (including Subchapter T)	<input type="checkbox"/> Groundwater Alternate SRC Demonstration
<input type="checkbox"/> New Registration (including Subchapter T)	<input type="checkbox"/> Groundwater Corrective Action
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Groundwater Monitoring Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> Groundwater Statistical Evaluation
<input type="checkbox"/> Limited Scope Major Amendment	<input type="checkbox"/> Landfill Gas Corrective Action
<input type="checkbox"/> Notice Modification	<input type="checkbox"/> Landfill Gas Monitoring
<input type="checkbox"/> Non-Notice Modification	<input type="checkbox"/> Liner Evaluation Report
<input type="checkbox"/> Transfer/Name Change Modification	<input type="checkbox"/> Soil Boring Plan
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Special Waste Request
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Other:
<input type="checkbox"/> Subchapter T Workplan	
<input type="checkbox"/> Other:	

Table 2 - Industrial & Hazardous Waste

APPLICATIONS	REPORTS and RESPONSES
<input type="checkbox"/> New	<input type="checkbox"/> Annual/Biennial Site Activity Report
<input type="checkbox"/> Renewal	<input type="checkbox"/> CfPT Plan/Result
<input type="checkbox"/> Post-Closure Order	<input type="checkbox"/> Closure Certification/Report
<input type="checkbox"/> Major Amendment	<input type="checkbox"/> Construction Certification/Report
<input type="checkbox"/> Minor Amendment	<input type="checkbox"/> CPT Plan/Result
<input type="checkbox"/> Class 3 Modification	<input type="checkbox"/> Extension Request
<input type="checkbox"/> Class 2 Modification	<input checked="" type="checkbox"/> Groundwater Monitoring Report - Evap Pond
<input type="checkbox"/> Class 1 ED Modification	<input type="checkbox"/> Interim Status Change
<input type="checkbox"/> Class 1 Modification	<input type="checkbox"/> Interim Status Closure Plan
<input type="checkbox"/> Endorsement	<input type="checkbox"/> Soil Core Monitoring Report
<input type="checkbox"/> Temporary Authorization	<input type="checkbox"/> Treatability Study
<input type="checkbox"/> Voluntary Revocation	<input type="checkbox"/> Trial Burn Plan/Result
<input type="checkbox"/> 335.6 Notification	<input type="checkbox"/> Unsaturated Zone Monitoring Report
<input type="checkbox"/> Other:	<input type="checkbox"/> Waste Minimization Report
	<input type="checkbox"/> Other:



Annual Groundwater Monitoring and Corrective Action Report

Calaveras Power Station –
Evaporation Pond
San Antonio, Texas

PREPARED FOR
CPS Energy

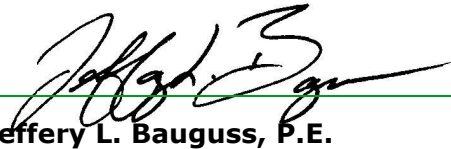
DATE
30 January 2024

REFERENCE
0681818



Annual Groundwater Monitoring and Corrective Action Report

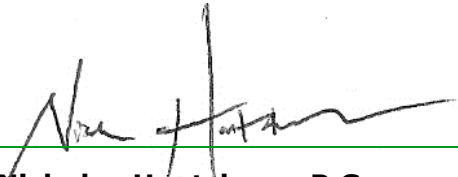
Calaveras Power Station –
Evaporation Pond
San Antonio, Texas
0681818



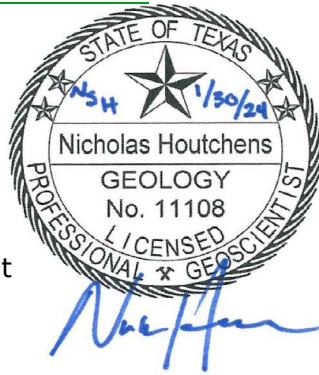
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CLIENT: CPS Energy

PROJECT NO: 0681818

DATE: 30 January 2024 VERSION: 01

AUS\Projects\0681818\DM\12201A 2023 GWMR EP

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1. CURRENT STATUS SUMMARY

As required in Title 40, Code of Federal Regulations (CFR), Part 257.90 and Title 30, Texas Administrative Code (TAC), Chapter 352.901, this section provides an overview of the current status of the groundwater monitoring and corrective action program for the Evaporation Pond (EP) located at the CPS Energy Calaveras Power Station:

- At the start of the 2023 annual reporting period, the EP was operating under the detection monitoring program, as defined in 40 CFR §257.94 and 30 TAC §352.941.
- At the end of the 2023 annual reporting period, the EP was operating under the detection monitoring program, as defined in 40 CFR §257.94 and 30 TAC §352.941.
- An *Alternative Source Demonstration* was prepared and submitted pursuant to 40 CFR §257.94(e) and 30 TAC §352.941 during the 2023 annual reporting period.
- At this time, there was no confirmed statistically significant increase over background for one or more constituents listed in Appendix III pursuant to 40 CFR §257.94(e) and 30 TAC §352.941(a).
- An assessment monitoring program was not required or initiated for the EP.
- A remedy was not required or selected pursuant to 40 CFR §257.97 and 30 TAC §352.971 during the 2023 annual reporting period.
- No remedial activities were initiated or are ongoing pursuant to 40 CFR §257.98 and 30 TAC §352.981 during the 2023 annual reporting period.

2. INTRODUCTION

CPS Energy owns and operates the Calaveras Power Station which consists of two power plants [J.T. Deely (ceased operation at the end of December 2018) and J.K. Spruce] that are subject to regulation under Title 40, Code of Federal Regulations, Part 257 (40 CFR §257) Subpart D (a.k.a. the Federal CCR Rule) and Title 30, Texas Administrative Code, Chapter 352 (30 TAC §352), Subchapter H (a.k.a. the Texas CCR Rule), collectively referred to as the CCR Rules. The Power Station is located in unincorporated Bexar County, Texas, approximately 13 miles southeast of San Antonio. Currently, two CCR units [Fly Ash Landfill (FAL) and Plant Drains Pond (PDP)] are in operation and three CCR units [Bottom Ash Ponds (BAPs), Evaporation Pond (EP) and Sludge Recycle Holding Pond (SRHP)] are undergoing closure. This *Annual Groundwater Monitoring and Corrective Action Report* (Report) addresses only the EP.

This Report was produced by Environmental Resource Management, Inc. (ERM), on behalf of CPS Energy, and summarizes the groundwater monitoring activities for the EP in 2023 and provides a statistical summary of the findings for samples collected in October 2023. Consistent with the notification requirements of the CCR Rule, this Report will be posted to the operational record and notification will be made to the State of Texas. Additionally, this Report will be placed on the publicly accessible internet site. The table below cross references the reporting requirements under the CCR Rule with the contents of this Report.

Regulatory Requirement Cross-Reference

Regulatory Citation	Requirement (paraphrased)	Where Addressed in this Report
40 CFR §257.90(e) and 30 TAC §352.901	Status of the groundwater monitoring and corrective action program	Sections 1 and 3
40 CFR §257.90(e) and 30 TAC §352.901	Summarize key actions completed	Section 3
40 CFR §257.90(e) and 30 TAC §352.901	Describe any problems encountered and actions to resolve problems	Section 3
40 CFR §257.90(e) and 30 TAC §352.901	Key activities for upcoming year	Section 5
40 CFR §257.90(e)(1) and 30 TAC §352.901	Map or aerial image of CCR unit and monitoring wells	Figure 1
40 CFR §257.90(e)(2) and 30 TAC §352.901	Identification of new monitoring wells installed or decommissioned during the preceding year	Section 3
40 CFR §257.90(e)(3) and 30 TAC §352.901	Summary of groundwater data, monitoring wells and dates sampled, and whether sample was required under detection or assessment monitoring	Sections 3 and 4, Tables 1 through 3, and Figures 2A and 2B

Regulatory Citation	Requirement (paraphrased)	Where Addressed in this Report
40 CFR §257.90(e)(4) and 30 TAC §352.901	Narrative discussion of any transition between monitoring programs	Section 5

The EP is located northeast of the Power Station generating units and is south of the FAL. The EP received boiler chemical cleaning waste and other authorized liquid wastes. The EP was originally constructed as a fly ash landfill, but was converted from a landfill to an impoundment in 1996. The CCR unit location is shown in Figure 1.

3. PROGRAM STATUS

From December 2016 through October 2017, groundwater samples were collected as part of background sampling. After October 2017, groundwater samples were collected as part of Detection Monitoring. The samples were collected from the groundwater monitoring well network certified for use in determining compliance with the CCR Rules.

Historically, the groundwater monitoring well network consisted of three upgradient monitor wells (JKS-47, JKS-63R, and JKS-64) and three downgradient monitor wells (JKS-36, JKS-61, and JKS-62). As documented in the *2020 Annual Groundwater Monitoring and Corrective Action Report – Evaporation Pond* (ERM, 2021), non-proportional changes in water levels were observed during the 2020 monitoring events and a site-wide water level study (Study) was recommended to understand temporal changes in hydrogeology. ERM completed this Study by collecting five rounds of water level measurements at each CCR Unit, which included observations from other on-site monitor wells, from February to October 2021.

As documented in the Study, JKS-64 no longer appeared to be a viable background well. Therefore, ERM recommended that JKS-64 be re-designated as a downgradient well for monitoring and statistical analysis. As such, the revised groundwater monitoring well network consists of two upgradient monitor wells (JKS-47 and JKS-63R) and four downgradient monitor wells (JKS-36, JKS-61, JKS-62, and JKS-64). This revision to the groundwater monitoring network is documented in the updated *Groundwater Monitoring System* (ERM, 2023) and the updated *Groundwater Sampling and Analysis Program (GSAP)* (ERM, 2023).

In October 2023, an additional well, JKS-72, was installed north of the EP to expand the monitoring well network surrounding the CCR unit. It is anticipated that JKS-72 will be designated as a downgradient monitoring well; however, CPS Energy is currently confirming survey data.

All monitor wells are screened within the uppermost groundwater bearing unit (GWBU) in the vicinity of the EP. The uppermost GWBU is approximately 20 feet thick and is comprised of clayey/silty sand to well-sorted sand. The uppermost GWBU is located below unconfining units (i.e., sands, silts, and low to medium plasticity clays), and above a high plasticity clay (lower confining unit).

The monitor well locations are shown in Figure 1. No problems were encountered in the data collection or in well performance with the exception of JKS-62. Groundwater samples were not collected from JKS-62 during the April and October 2023 sampling events due to well performance (well went dry). JKS-62 well performance will be evaluated prior to the April 2024 sampling event. As mentioned above, JKS-72 was installed in October 2023. No monitor wells were decommissioned in 2023.

Although CPS Energy ceased operation of the EP in September 2022 in preparation for closure; the EP will continue to be monitored until the unit has completed closure.

3.1 GROUNDWATER OBSERVATIONS

Depth to groundwater surface measurements were made at each monitor well prior to each sampling event. Groundwater elevations were calculated by subtracting the depth to ground-water measurement from the surveyed reference elevation for each well.



Groundwater elevations collected during all the monitoring events are summarized in Table 1. Groundwater elevations and the potentiometric surface for the April and October 2023 monitoring events are shown in Figure 2A and Figure 2B, respectively. For both sampling events, groundwater north of the EP appears to flow southeast and groundwater south of the EP appears to flow generally east and northeast. The horizontal gradient is approximately 0.003 feet/foot and 0.004 feet/foot for the April and October 2023 monitoring events, respectively.

3.2 SAMPLING SUMMARY

A summary of the total number of samples collected from each monitor well is provided in Table 2. Groundwater analytical results for Appendix III constituents for all the monitoring events are summarized in Table 3. Laboratory data packages are provided in Appendix A.

The EP monitor wells were sampled by CPS Energy using low flow sampling techniques during the monitoring events. With the exception of JKS-62 (as noted above), no other data gaps were identified during the 2023 semi-annual groundwater monitoring events.

3.3 DATA QUALITY

ERM reviewed field and laboratory documentation to assess the validity, reliability and usability of the analytical results. Samples were sent to San Antonio Testing Laboratory (SATL), located in San Antonio, Texas for analysis. Chain-of-Custody procedures were followed throughout the sample handling process. Data quality information reviewed for these results included field sampling forms, chain-of-custody documentation, holding times, lab methods, cooler temperatures, laboratory method blanks, laboratory control sample recoveries, field duplicate samples, matrix spikes / matrix spike duplicates, quantitation limits, and equipment blanks following data quality review guidance from the Environmental Protection Agency and the Texas Commission on Environmental Quality. A summary of the data usability qualifiers is included in Table 3. The data quality review found the results to be valid, reliable, and useable for decision making purposes with the listed qualifiers. No analytical results were rejected.

4. STATISTICAL ANALYSIS AND RESULTS

Consistent with the CCR Rules and with the updated *GSAP*, a prediction limit approach (40 CFR §257.93(f)) was used to identify potential impacts to groundwater. The steps outlined in the decision framework in the *GSAP* include:

- Interwell versus intrawell comparisons;
- Establishment of the upgradient dataset;
- Calculating prediction limits; and
- Conclusions.

Tables and figures generated as part of the statistical analysis, including updating of prediction limits are provided in Appendix B. The remaining sections of the report are focused on evaluation of the most recent October 2023 data. Note the April 2023 sampling results were evaluated as discussed in Appendix C. The April 2023 sampling results were evaluated relative to the pre-updated prediction limits.

4.1 INTERWELL VERSUS INTRAWELL COMPARISONS

When multiple upgradient wells were available within the same unit, concentrations were compared among these wells to determine if they could be pooled to create a single, interwell, upgradient dataset. For each analyte, Boxplots (Appendix B, Figure 1) and Kruskal-Wallis test results (Appendix B, Table 1) are provided for upgradient wells. The statistical tests indicate that:

- Two analytes [Fluoride and pH] are suitable for interwell analysis, with no significant differences present in upgradient data; and
- The remaining five analytes [Boron, Calcium, Chloride, Sulfate, and TDS] rely on intrawell analysis, as there are significant differences present in upgradient data.

As discussed in the *GSAP* and presented in the following sections, analytes for interwell analysis utilize a pooled dataset of all upgradient wells, whereas analytes for intrawell analysis utilize individual, separate datasets from each upgradient well.

4.2 ESTABLISHMENT OF UPGRADIENT DATASET

When evaluating the concentrations of analytes in groundwater, USEPA guidance (2009) recommends performing a careful quality check of the data to identify any anomalies. In addition to the data validation that was performed, descriptive statistics, outlier testing, and temporal stationarity checks were completed to finalize the upgradient dataset.

4.2.1 DESCRIPTIVE STATISTICS

Descriptive statistics were calculated for the upgradient wells and analytes at the site (Appendix B, Table 2). The descriptive statistics highlight a number of relevant characteristics about the upgradient datasets including:

- There are two upgradient monitoring wells and seven Appendix III constituents for Detection Monitoring.

- There are a total of 12 well-analyte combinations after accounting for interwell versus intrawell analysis.
 - 12 well-analyte combinations have detection rates greater than or equal to 50 percent.
 - Ten well-analyte combinations have 100 percent detects.
 - Six well-analyte combinations follow a normal distribution (using Shapiro-Wilks Normality Test).
 - Two well-analyte combinations follow a log-normal distribution.
 - The remaining well-analyte combinations have no discernible distribution.

4.2.2 OUTLIER DETERMINATION

Both statistical and visual outlier tests were performed on the upgradient datasets. A total of three outliers were initially flagged in the upgradient datasets. Data points identified as both statistical and visual outliers (Appendix B, Table 3 and Appendix B, Figure 2) were reviewed prior to exclusion from the dataset.

Of the three data points that were flagged as outliers, all three were retained in the dataset. After review, it was determined that these values were consistent with natural fluctuations and concentrations detected in other upgradient wells in the area. No analytical or sampling issues were identified during data review; therefore, the three outlier values were considered valid and were retained in the upgradient datasets.

4.2.3 CHECK FOR TEMPORAL STABILITY

A trend test was performed for all values in the upgradient wells with at least eight detected data points and at least 50 percent detection rate. Time series figures of upgradient wells are provided in Appendix B, Figure 3. Additionally, the Mann Kendall trend test results are provided in Appendix B, Table 4. The results of the trend analysis indicate that:

- There are a total of 12 well-analyte combinations in the upgradient dataset.
 - 12 well-analyte combinations meet the data requirements of the trend test.
 - Four well-analyte combinations had a significant increasing trend.
 - One well-analyte combinations had a significant decreasing trend.
 - Seven well-analyte combinations had no significant trend (i.e., concentrations were stable over time).

4.3 ESTABLISHING UPPER PREDICTION LIMITS

A multi-part assessment of the monitoring wells was performed to determine what type of upper prediction limit (UPL) to calculate as a compliance point. A decision framework was applied for each upgradient well based on interwell/intrawell analysis, data availability, and presence of temporal trends. A summary of the prediction limits and the methods used to calculate them are provided in Appendix B, Table 5.

A total of five well-analyte combinations were found to have either increasing or decreasing trends. For these well-analyte pairs, a bootstrapped UPL calculated around a Theil Sen trend was used to derive a more accurate UPL.

The remaining seven well-analyte combinations were found to have no significant trend. ProUCL v5.2 was used to calculate static UPLs using an annual site-wide false positive rate of 0.1 with a 1-of-2 re-testing approach.

A final UPL was selected for each analyte and compared to the most recent sample result in each downgradient well. For pH, a final lower prediction limit (LPL) was also identified and used for comparison. For the two analytes with interwell analysis, the upgradient dataset was pooled prior to UPL calculations, resulting in a single UPL value per analyte. For the five analytes with intrawell analysis, a UPL value was calculated for each of the upgradient wells. For these wells and analytes, the maximum UPL was selected as the representative UPL for each analyte, to capture the possible range of values found in upgradient wells. A similar approach was used to determine the LPL for pH; however, the minimum LPL was selected in the case of intrawell analysis. All final UPL and LPL values are shown in the table below. Full upgradient well prediction limit calculations are provided in Appendix B, Table 5.

Final UPLs and LPLs Values

Analysis Type	Analyte	LPL	UPL	Unit
Intrawell	Boron	–	1.65	mg/L
Intrawell	Calcium	–	1,410	mg/L
Intrawell	Chloride	–	3,570	mg/L
Interwell	Fluoride	–	0.243	mg/L
Interwell	pH	5.08	6.68	SU
Intrawell	Sulfate	–	2,550	mg/L
Intrawell	TDS	–	11,600	mg/L

4.4 CONCLUSIONS

The downgradient samples collected during the October 2023 sampling event were used for compliance comparisons. All downgradient wells were below the UPLs and above the LPLs with the following exceptions shown on the table below. Full downgradient results are provided in Appendix B, Table 6.

Potential Exceedances

Analyte	Well	LPL	UPL	Sample Date	Value	Unit
Fluoride	JKS-36	–	0.243	2023-10-17	0.517	mg/L
Fluoride	JKS-61	–	0.243	2023-10-17	0.445	mg/L
pH	JKS-36	5.08	6.68	2023-10-17	6.99	SU

Analyte	Well	LPL	UPL	Sample Date	Value	Unit
pH	JKS-61	5.08	6.68	2023-10-17	7.51	SU

Initial exceedances of the UPL may be confirmed with re-testing of the downgradient wells per the 1-of-2 retesting scheme. If the initial exceedance is confirmed with re-testing results in the same well, the well-analyte pair will be declared a statistically significant increase (SSI) above background. If an SSI is found, a notification or alternate source demonstration will be prepared within 90 days. Any wells with re-testing results at or below the UPL, and at or greater than the LPL, will be considered in compliance and will not require further action. These re-testing results will be reported in the subsequent *Alternative Source Demonstration*.

All downgradient wells with initial exceedances were examined for trends to assess the stability of concentrations. A summary of these trend test results can be found in Appendix B, Table 6. Of the wells with potential SSIs, fluoride concentrations had a decreasing trend at JKS-61.

All wells with potential SSIs are plotted in Appendix B, Figure 4. All potential SSIs are within one order of magnitude of their UPLs. Trends in these wells relative to UPLs will be monitored closely in future sampling events.

5. RECOMMENDATIONS

Currently, there are no plans to transition between Detection Monitoring and Assessment Monitoring. Consistent with the 1-of-2 retesting approach described in the Unified Guidance (USEPA 2009) and the *GSAP*, initial exceedances may be retested within 90 days. Based on these findings, Detection Monitoring and/or Assessment Monitoring will be initiated as appropriate under 40 CFR §257.94 and 30 TAC §352.941, and 40 CFR §257.95 and 30 TAC §352.951.

6. REFERENCES

- ERM, 2023. *Groundwater Monitoring System*. CPS Energy, Calaveras Power Station, San Antonio, Texas.
- ERM, 2023. *Groundwater Sampling and Analysis Program*. CPS Energy, Calaveras Power Station, San Antonio, Texas.
- USEPA. 2009. *Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities*. Unified Guidance. USEPA/530/R/09/007. Office of Resource Conservation and Recovery. Washington, D.C.



TABLES

TABLE 1 GROUNDWATER ELEVATIONS SUMMARY

TABLE 2 GROUNDWATER SAMPLING SUMMARY

TABLE 3 GROUNDWATER ANALYTICAL RESULTS SUMMARY

TABLE 1
Groundwater Elevations Summary
CPS Energy - Calaveras Power Station
Evaporation Pond

Sampling Event	Sampling Event Dates	JKS-47 Upgradient (1)		JKS-63 Upgradient		JKS-63R Upgradient		JKS-64 Downgradient	
		TOC Elevation	513.63	TOC Elevation	526.86	TOC Elevation	522.27	TOC Elevation	507.84
		Depth to Water (feet btoc)	Water Level (msl)	Depth to Water (feet btoc)	Water Level (msl)	Depth to Water (feet btoc)	Water Level (msl)	Depth to Water (feet btoc)	Water Level (msl)
1	12/6/16 to 12/8/16	30.98	482.65	44.45	482.41	(4)	(4)	24.98	482.86
2	2/21/17 to 2/23/17	30.64	482.99	44.25	482.61	(4)	(4)	24.24	483.60
3	3/28/17 to 3/30/17	30.47	483.16	44.12	482.74	(4)	(4)	24.21	483.63
4	5/2/17 to 5/4/17	30.29	483.34	43.89	482.97	(4)	(4)	24.46	483.38
5	6/20/17 to 6/21/17	30.40	483.23	43.85	483.01	(4)	(4)	24.40	483.44
6	7/25/17 to 7/26/17	30.62	483.01	44.00	482.86	(4)	(4)	24.78	483.06
7	8/29/17 to 8/30/17	30.50	483.13	43.90	482.96	(4)	(4)	25.70	482.14
8	10/10/17 to 10/11/17	30.71	482.92	44.05	482.81	(4)	(4)	24.95	482.89
9	4/4/18 to 4/5/18	30.42	483.21	43.81	483.05	(4)	(4)	24.67	483.17
10	10/30/18 to 10/31/18	30.90	482.73	(2)	(2)	(4)	(4)	25.46	482.38
11	4/9/19 to 4/10/19	30.17	483.46	(2)	(2)	39.27 (5)	483.00	24.50	483.34
12	10/22/19 to 10/23/19	30.87	482.76	(3)	(3)	39.48	482.79	25.30	482.54
13	4/28/20 to 4/29/20	30.60	483.03	(3)	(3)	39.36	482.91	25.15	482.69
14	10/20/20 to 10/21/20	31.28	482.35	(3)	(3)	40.25 (6)	482.02	25.88	481.96
15	4/13/21 to 4/14/21	31.24	482.39	(3)	(3)	39.85	482.42	25.88	481.96
16	10/19/21 to 10/20/21	31.12	482.51	(3)	(3)	39.91	482.36	25.12	482.72
17	4/13/22 to 4/14/22	31.26	482.37	(3)	(3)	39.90	482.37	29.58	478.26
18	10/13/22 to 10/14/22	31.73	481.90	(3)	(3)	40.32	481.95	26.20	481.64
19	4/13/23 TO 4/16/23	31.49	482.14	(3)	(3)	40.40	481.87	26.51	481.33
20	10/10/2023	32.17	481.46	(3)	(3)	40.67	481.60	26.79	481.05

Sampling Event	Sampling Event Dates	JKS-36 Downgradient		JKS-61 Downgradient		JKS-62 Downgradient	
		TOC Elevation	508.51	TOC Elevation	505.51	TOC Elevation	509.84
		Depth to Water (feet btoc)	Water Level (msl)	Depth to Water (feet btoc)	Water Level (msl)	Depth to Water (feet btoc)	Water Level (msl)
1	12/6/16 to 12/8/16	25.99	482.42	23.95	481.56	28.63	481.21
2	2/21/17 to 2/23/17	25.78	482.63	23.31	482.20	28.30	481.54
3	3/28/17 to 3/30/17	25.37	483.04	23.10	482.41	28.42	481.42
4	5/2/17 to 5/4/17	43.89	464.52	22.85	482.66	28.00	481.84
5	6/20/17 to 6/21/17	25.40	483.01	22.05	483.46	28.05	481.79
6	7/25/17 to 7/26/17	25.62	482.79	23.50	482.01	28.12	481.72
7	8/29/17 to 8/30/17	25.70	482.71	23.60	481.91	28.12	481.72
8	10/10/17 to 10/11/17	25.91	482.50	23.97	481.54	28.00	481.84
9	4/4/18 to 4/5/18	25.46	482.95	23.08	482.43	27.66	482.18
10	10/30/18 to 10/31/18	25.90	482.51	23.94	481.57	28.33	481.51
11	4/9/19 to 4/10/19	25.23	483.18	22.97	482.54	27.52	482.32
12	10/22/19 to 10/23/19	25.90	482.51	24.20	481.31	27.85	481.99
13	4/28/20 to 4/29/20	25.45	482.96	23.74	481.77	27.78	482.06
14	10/20/20 to 10/21/20	26.03	482.38	24.60	480.91	29.10 (6)	480.74
15	4/13/21 to 4/14/21	26.08	482.33	24.54	480.97	28.56	481.28
16	10/19/21 to 10/20/21	26.14	482.27	24.05	481.46	28.19	481.65
17	4/13/22 to 4/14/22	26.28	482.23	23.93	481.58	28.25	481.59
18	10/13/22 to 10/14/22	26.44	482.07	25.37	480.14	28.95	480.89
19	4/13/23 to 4/16/23	26.55	481.96	24.97	480.54	28.44	481.40
20	10/10/2023	26.98	481.53	25.97	479.54	28.79	481.05

NOTES:

btoc = below top of casing

msl = mean sea level

(1) JKS-47 was re-sampled on 2/28/17.

(2) Blockage in JKS-63 well casing.

(3) JKS-63 was plugged and abandoned on 5/2/19.

(4) JKS-63R was installed on 5/2/19 to replace JKS-63.

(5) JKS-63R water level was initially measured on 8/20/19.

(6) JKS-62 and JKS-63R were gauged on 11/17/20 due to a blockage encountered in the well casing during Event 14 (October 2020).

TABLE 2
Groundwater Sampling Summary
CPS Energy - Calaveras Power Station
Evaporation Pond

CCR Unit	Well ID	Well Function	Number of Samples Collected in 2016 - 2023	2016 - 2023 Sample Dates																			Monitoring Program	
				12/6/16 to 12/8/16	2/21/17 to 2/23/17	3/28/17 to 3/30/17	5/2/17 to 5/4/17	6/20/17 to 6/21/17	7/25/17 to 7/26/17	8/29/17 to 8/30/17	10/10/17 to 10/11/17	4/4/18 to 4/5/18	10/30/18 to 10/31/18	4/9/19 to 4/10/19	10/22/19 to 10/23/19	4/28/20 to 4/29/20	10/20/20 to 10/21/20	4/13/21 to 4/14/21	10/19/21 to 10/20/21	4/13/22 to 4/14/22	10/13/22 to 10/14/22	4/13/23 to 4/16/23		10/17/23 to 10/18/23
Evaporatio n Pond	JKS-36	Downgradient Monitoring	18	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Detection
	JKS-47	Upgradient Monitoring	18	X	X (1)	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Detection
	JKS-61	Downgradient Monitoring	18	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Detection
	JKS-62	Downgradient Monitoring	17	X	X	X	X	X	X	X	X	X	X	X	X	X (6)	X	X	X	(7)	(7)	(7)	Detection	
	JKS-63	Plugged and Abandoned	8	X	X	X	X	(2)	X	X	X	(3)	(3)	(3)	(3)	(3)	(3)	(3)	(3)	(3)	(3)	(3)	None	
	JKS-63R	Upgradient Monitoring	7	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4)	(4) (5)	X	X	X (6)	X	X	X	X	X	X	Detection	
	JKS-64	Downgradient Monitoring	18	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	Detection	
	JKS-72	Downgradient Monitoring	1	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	(8)	X	Detection		

NOTES:
X = Indicates that a sample was collected.
(1) JKS-47 was re-sampled on 2/28/2017.
(2) JKS-63 was not sampled during Event 5 (June 2017), due to the well going dry during sampling activities.
(3) JKS-63 was not sampled during Event 10 (October 2018) and Event 11 (April 2019) due to blockage in the well casing. JKS-63 was plugged and abandoned on 5/2/19.
(4) JKS-63R was installed on 5/2/19 to replace JKS-63.
(5) JKS-63R was initially sampled on 8/20/19.
(6) JKS-62 and JKS-63R were sampled on 11/17/20. Samples were not collected during the October 2020 sampling event due to blockages in the well casings.
(7) JKS-62 was not sampled due to the well going dry before sampling activities.
(8) JKS-72 was installed on 10/4/23.

TABLE 3
Groundwater Analytical Results Summary
CPS Energy - Calaveras Power Station
Evaporation Pond

		JKS-47 Upgradient																			
Sample Date		12/8/16	2/28/17	3/29/17	5/3/17	6/21/17	7/26/17	8/30/17	10/11/17	4/5/18	10/30/18	4/10/19	10/23/19	4/29/20	10/21/20	4/14/21	10/19/21	4/14/22	10/26/22	04/19/23	10/18/23
Task		Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Event 12	Event 13	Event 14	Event 15	Event 16	Event 17	Event 18	Event 19	Event 20
Constituents	Unit	Dec 2016	Feb 2017	Mar 2017	May 2017	Jun 2017	Jul 2017	Aug 2017	Oct 2017	Apr 2018	Oct 2018	Apr 2019	Oct 2019	Apr 2020	Oct 2020	Apr 2021	Oct 2021	Apr 2022	Oct 2022	April 2023	Oct 2023
Appendix III - Detection Monitoring																					
Boron	mg/L	0.824	0.838	0.696	0.817	0.804	0.828 JH	0.760	1.02	0.844	0.806	0.590	1.05	0.800	0.904 JL	0.816	0.881	0.947	0.852	0.680	0.761 JL
Calcium	mg/L	54.0	62.1	168	26.2	71.1	62.7 JH	66.7	36.1	53.5	83.2 D	128	36.5	43.1	28.4	62.1	67.1	47.0	60.1	77.5	68.8
Chloride	mg/L	107	150	232 D	193	168	148 JH	210 D	68.5	151	186	279	53.9 X	107	60.9	154	162	123	133	196	168
Fluoride	mg/L	0.0360 U	0.0360 U	0.315	0.382 JH	0.213 JH	0.360 U	0.0960 U	0.0360 U	0.0360 U	0.0998 J	0.0985 J	0.154 JH	0.163	0.161	0.142	0.018 U	0.018 U	0.018 U	0.018 U	0.101
Sulfate	mg/L	213 D	267 D	369 D	299	266 D	248 JH	284 D	171	236	262	347	210 X	257	195	278	271	279	260	295	265 J
pH - Field Collected	SU	5.82	5.83	5.75	6.00	5.75	5.85	5.90	5.93	5.91	5.72	5.92	4.58	5.87	5.88	6.09	6.16	6.26	6.12	5.56	6.01
Total dissolved solids	mg/L	811	922	1170	1060	979	806 JH	904	677	787	727	1240	665	772	782	929	980	826	935	1040	899
Appendix IV - Assessment Monitoring																					
Antimony	mg/L	0.00120 U	0.000240 U	0.000294 J	0.00120 U	0.000275 J	0.000240 U	0.000240 U	0.000240 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Arsenic	mg/L	0.00442 J	0.00130 J	0.00136 J	0.00123 U	0.00185 J	0.00105 J	0.00124 J	0.000246 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Barium	mg/L	0.0475	0.0132	0.0180	0.0118 J	0.0154	0.00981	0.0104	0.00785	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Beryllium	mg/L	0.000813 J	0.000255 J	0.000131 U	0.000654 U	0.000352 J	0.000131 U	0.000172 J	0.000131 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cadmium	mg/L	0.000734 U	0.000637 J	0.000977 J	0.000797 J	0.000735 J	0.000611 J	0.000814 J	0.000147 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Chromium	mg/L	0.234	0.00430	0.000988 J	0.00262 U	0.00262 J	0.000855 J	0.00130 J	0.000525 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cobalt	mg/L	0.00915 J	0.00102 J	0.00153 J	0.00113 J	0.00227	0.000976 J	0.00107 J	0.0000699 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Fluoride	mg/L	0.0360 U	0.0360 U	0.315	0.382 JH	0.213 JH	0.360 U	0.0960 U	0.0360 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Lead	mg/L	0.00586 J	0.000950 J	0.000448 J	0.000758 U	0.00157 J	0.000202 J	0.000449 J	0.000152 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Lithium	mg/L	0.0615	0.0478	0.00238 U	0.0207	0.0720	0.0644	0.0799	0.0521	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Mercury	mg/L	0.0000600 J	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Molybdenum	mg/L	0.0317	0.00126 J	0.00173 J	0.00128 J	0.000788 J	0.000581 J	0.000653 J	0.000255 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Selenium	mg/L	0.0493	0.0697	0.0518	0.0564	0.0613	0.0577	0.0525	0.0854	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Thallium	mg/L	0.00166 U	0.000332 U	0.000332 U	0.00166 U	0.000332 U	0.000332 U	0.000332 U	0.000332 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-226	pCi/L	1.2 ± 0.342	0.578 ± 0.275	0.630 ± 0.237	0.538 ± 0.192	0.729 ± 0.278	0.304 ± 0.233	1.06 ± 0.361	0.246 ± 0.180	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-228	pCi/L	1.66 ± 1.15	1.34 ± 1.05	1.27 ± 0.960 U	2.17 ± 1.01	0.664 ± 0.929	0.771 ± 1.48	1.65 ± 1.05	0.463 ± 0.886	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-226/228 Combined	pCi/L	2.86 ± 1.492	1.918 ± 1.325	1.9 ± 1.197 U	2.708 ± 1.202	1.393 ± 1.207	1.075 ± 1.713	2.71 ± 1.411	0.709 ± 1.066	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR

NOTES:
(A) JKS-63 plugged and abandoned and replaced with JKS-63R on 5/2/19. Sample events 1 through 10 collected from JKS-63 and thereafter from JKS-63R.
(1) Sample not collected due to the well going dry during sampling activities.
(2) Sample not collected due to blockage in the well casing.
mg/L: Milligrams per Liter.
SU: Standard Units.
pCi/L: Picocuries per Liter.
-- : Laboratory did not analyze sample for indicated constituent.
R: Resample event.
B: Target analyte or common lab contaminant was identified in the method blank.
D: Sample diluted due to targets detected over highest point of calibration curve or due to matrix interference.
J: Analyte detected above method (sample)
H: Bias in sample result likely to be high.
NR: Analysis of this constituent not required for detection monitoring.
L: Bias in sample result likely to be low.
U: Analyte not detected at laboratory reporting limit (Sample Detection Limit).
X: Matrix Spike/Matrix Spike Duplicate recoveries were found to be outside of the laboratory control limits.

TABLE 3
Groundwater Analytical Results Summary
CPS Energy - Calaveras Power Station
Evaporation Pond

		JKS-63 / JKS-63R Upgradient (A)																			
Sample Date		12/8/16	2/22/17	3/29/17	5/3/17	--	7/26/17	8/30/17	10/11/17	4/5/18	--	8/20/19	10/23/19	4/29/20	11/17/20	4/14/21	10/19/21	4/14/22	10/26/22	04/18/23	10/18/23
Task		Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Event 12	Event 13	Event 14	Event 15	Event 16	Event 17	Event 18	Event 19	Event 20
Constituents	Unit	Dec 2016	Feb 2017	Mar 2017	May 2017	Jun 2017	Jul 2017	Aug 2017	Oct 2017	Apr 2018	Oct 2018	Apr 2019	Oct 2019	Apr 2020	Nov 2020	Apr 2021	Oct 2021	Apr 2022	Oct 2022	April 2023	Oct 2023
Appendix III - Detection Monitoring																					
Boron	mg/L	0.800	0.866	NR	0.981	(1)	1.33 JH	1.23	1.06	1.13	(2)	2.03	1.03	0.950	1.12	1.12	1.23	1.16	1.27	1.11	1.33 JL
Calcium	mg/L	783	914	713	1060	(1)	835	174	872	836	(2)	221	953 D	952	1050	1060	1140	1000	1200	886	949
Chloride	mg/L	1230 D	1160 D	1220 D	1340	(1)	1960 JHD	1890 D	1420	1670	(2)	2360 D	2240	2530	2830	2440	2590	2550	3020	2850	2730
Fluoride	mg/L	0.0573 J	0.320	0.297	0.364 JH	(1)	0.0971 JH	0.182 JH	0.0360 U	0.0360 U	(2)	0.206 J	0.352 JH	0.018 U	0.018 U	0.018 U	0.018 U	0.124	0.018 U	0.018 U	0.050
Sulfate	mg/L	0.0460 U	1860 D	1890 D	1860	(1)	1970 D	1920 D	1820	2110	(2)	1810 D	1750 D	1810	2120	1720	1640	1760	1820	1890	1920 J
pH - Field Collected	SU	5.61	5.35	5.60	5.85	(1)	5.88	5.82	5.63	5.64	(2)	--	4.76	5.83	5.79	5.99	6.07	6.29	6.18	6.16	6.6
Total dissolved solids	mg/L	5750	4760	4870	5560	(1)	6410	5000	5080	5220	(2)	6660	5200	7240	8190	8440	9940	8390	10700	9540	7560
Appendix IV - Assessment Monitoring																					
Antimony	mg/L	0.00120 U	0.000459 J	0.000695 J	0.00120 U	(1)	0.000240 U	0.000424 J	0.000240 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Arsenic	mg/L	0.00332 J	0.00294	0.00128 J	0.00123 U	(1)	0.000893 J	0.000992 J	0.000246 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Barium	mg/L	0.0626	0.0540	0.0336	0.0316	(1)	0.0294	0.0258	0.0222	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Beryllium	mg/L	0.000654 U	0.000930 J	0.000442 J	0.000654 U	(1)	0.000196 J	0.000223 J	0.000131 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cadmium	mg/L	0.00339 J	0.00405	0.00394	0.00316 J	(1)	0.00282	0.00263	0.00285	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Chromium	mg/L	1.49	0.735	0.371	0.114	(1)	0.0742	0.0584	0.0130	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cobalt	mg/L	0.0802	0.0762	0.0546	0.0331	(1)	0.0137	0.0119	0.0119	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Fluoride	mg/L	0.0573 J	0.320	0.297	0.364 JH	(1)	0.0971 JH	0.182 JH	0.0360 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Lead	mg/L	0.00441 J	0.00599	0.00108 J	0.000758 U	(1)	0.000238 J	0.000551 J	0.000152 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Lithium	mg/L	0.000476 U	0.116	0.00238 U	0.654	(1)	0.946	1.15	0.791	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Mercury	mg/L	0.000236	0.000237	0.000206	0.0000400 J	(1)	0.000260	0.000441	0.000376	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Molybdenum	mg/L	0.186	0.00789	0.00966	0.00419 J	(1)	0.00281	0.00180 J	0.000255 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Selenium	mg/L	0.0188	0.0210	0.0257	0.0188	(1)	0.0288	0.0318	0.0244	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Thallium	mg/L	0.00166 U	0.000332 U	0.000332 U	0.00166 U	(1)	0.000332 U	0.000332 U	0.000332 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-226	pCi/L	3.42 ± 0.573	2.76 ± 0.476	5.79 ± 0.790	4.57 ± 0.577	(1)	6.7 ± 0.744	7.36 ± 0.874	5.04 ± 0.711	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-228	pCi/L	2.44 ± 1.44	4.13 ± 1.21	2.04 ± 1.61 U	3.41 ± 0.968	(1)	10.9 ± 2.31	1.79 ± 1.27	6.77 ± 1.48	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-226/228 Combined	pCi/L	5.86 ± 2.013	6.89 ± 1.686	7.83 ± 2.4 U	7.98 ± 1.545		17.6 ± 3.054	9.15 ± 2.144	11.81 ± 2.191	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR

NOTES:
(A) JKS-63 plugged and abandoned and replaced with JKS-63R on 5/2/19. Sample events 1 through 10 collected from JKS-63 and thereafter from JKS-63R.
(1) Sample not collected due to the well going dry during sampling activities.
(2) Sample not collected due to blockage in the well casing.
mg/L: Milligrams per Liter.
SU: Standard Units.
pCi/L: Picocuries per Liter.
-- : Laboratory did not analyze sample for indicated constituent.
R: Resample event.
B: Target analyte or common lab contaminant was identified in the method blank.
D: Sample diluted due to targets detected over highest point of calibration curve or due to matrix interference.
J: Analyte detected above method (sample)
H: Bias in sample result likely to be high.
NR: Analysis of this constituent not required for detection monitoring.
L: Bias in sample result likely to be low.
U: Analyte not detected at laboratory reporting limit (Sample Detection Limit).
X: Matrix Spike/Matrix Spike Duplicate recoveries were found to be outside of the laboratory control limits.

TABLE 3
Groundwater Analytical Results Summary
CPS Energy - Calaveras Power Station
Evaporation Pond

		JKS-64 Downgradient																			
Sample Date		12/8/16	2/23/17	3/29/17	5/4/17	6/21/17	7/26/17	8/30/17	10/11/17	4/5/18	10/30/18	4/10/19	10/23/19	4/29/20	10/21/20	4/14/21	10/19/21	4/14/22	10/26/22	04/19/23	10/18/23
Task		Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Event 12	Event 13	Event 14	Event 15	Event 16	Event 17	Event 18	Event 19	Event 20
		Dec 2016	Feb 2017	Mar 2017	May 2017	Jun 2017	Jul 2017	Aug 2017	Oct 2017	Apr 2018	Oct 2018	Apr 2019	Oct 2019	Apr 2020	Oct 2020	Apr 2021	Oct 2021	Apr 2022	Oct 2022	April 2023	Oct 2023
Appendix III - Detection Monitoring																					
Boron	mg/L	0.839	0.837	1.14	0.962	0.816	0.904 JH	0.835	0.901	0.837	0.805	0.804	0.747	0.711	0.735 JL	0.771	0.844	0.874	0.731 JL	0.683	0.741
Calcium	mg/L	24.0	24.0	31.4	23.8	20.6	21.7 JH	21.6	25.2	23.6	24.4	23.0	24.4	20.3	20.4	23.9	0.0004 J	25.1	23.2	21.6	23.8
Chloride	mg/L	12.7	12.4	11.8	11.0	11.4	11.5	11.5	9.63	14.2	15.5	16.6	17.7	18.2	16.0	18.4	15.7	16.2	20.2	19.2	22.4
Fluoride	mg/L	0.0360 U	0.294 JH	0.332	0.188	0.231 JH	0.157 JH	0.224 JH	0.0360 U	0.0360 U	0.106 J	0.121 J	0.176 JH	0.143	0.101	0.380	0.018 U	0.183	0.383	0.107	0.110
Sulfate	mg/L	171	182	184	174	172	170 JH	172	164	189	196	193	192 X	209	212	218	196	202	209 J	212	205
pH - Field Collected	SU	6.46	5.50	6.30	6.33	6.21	6.09	6.20	6.21	6.13	5.97	6.14	4.82	5.86	5.96	6.07	6.19	6.36	6.20	5.51	6
Total dissolved solids	mg/L	594	585	611	581	572	555 JH	463	576	549	525	551	588	569	664	586	597	573	677	574	560
Appendix IV - Assessment Monitoring																					
Antimony	mg/L	0.000240 U	0.000240 U	0.000240 U	0.00120 U	0.000240 U	0.000240 U	0.000240 U	0.000240 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Arsenic	mg/L	0.000911 J	0.000730 J	0.000556 J	0.00123 U	0.000476 J	0.000490 J	0.000519 J	0.000246 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Barium	mg/L	0.00768	0.00451	0.00392 J	0.00410 J	0.00320 J	0.00324 J	0.00275 BJ	0.000484 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Beryllium	mg/L	0.000131 U	0.000131 U	0.000131 U	0.000654 U	0.000131 U	0.000131 U	0.000131 U	0.000131 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cadmium	mg/L	0.000147 U	0.000147 U	0.000147 U	0.000734 U	0.000147 U	0.000147 U	0.000147 U	0.000147 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Chromium	mg/L	0.000525 U	0.000905 J	0.000525 U	0.00262 U	0.000867 J	0.000637 J	0.000961 J	0.000525 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cobalt	mg/L	0.000998 J	0.000952 J	0.000851 J	0.000859 J	0.000745 J	0.000856 J	0.000889 J	0.0000699 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Fluoride	mg/L	0.0360 U	0.294 JH	0.332	0.188	0.231 JH	0.157 JH	0.224 JH	0.0360 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Lead	mg/L	0.000186 J	0.000152 U	0.000152 U	0.000758 U	0.000152 U	0.000152 U	0.000152 U	0.000152 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Lithium	mg/L	0.0173 J	0.0146 J	0.00238 U	0.0152 J	0.0173 J	0.0181 J	0.0252	0.0208	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Mercury	mg/L	0.0000263 UX	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000540 J	0.0000263 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Molybdenum	mg/L	0.000398 J	0.000317 J	0.000255 U	0.00128 U	0.000265 J	0.000255 U	0.000273 J	0.000255 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Selenium	mg/L	0.000512 J	0.000550 J	0.000495 J	0.00227 U	0.000468 J	0.000468 J	0.000454 U	0.000454 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Thallium	mg/L	0.000332 U	0.000332 U	0.000332 U	0.00166 U	0.000332 U	0.000332 U	0.000332 U	0.000332 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-226	pCi/L	0.981 ± 0.400	1.16 ± 0.408	0.530 ± 0.284	0.231 ± 0.174	0.258 ± 0.175	0.286 ± 0.247	1.05 ± 0.361	0.531 ± 0.276	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-228	pCi/L	0.429 ± 1.56	2.07 ± 1.22	-0.102 ± 1.07 U	0.408 ± 0.764	0.699 ± 0.761	2.49 ± 1.54	0.26 ± 0.639	1 ± 0.834	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-226/228 Combined	pCi/L	1.41 ± 1.96	3.23 ± 1.628	0.428 ± 0.284	0.639 ± 0.938	0.957 ± 0.936	2.776 ± 1.787	1.31 ± 1	1.531 ± 1.11	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR

NOTES:

(A) JKS-63 plugged and abandoned and replaced with JKS-63R on 5/2/19. Sample events 1 through 10 collected from JKS-63 and thereafter from JKS-63R.

(1) Sample not collected due to the well going dry during sampling activities.

(2) Sample not collected due to blockage in the well casing.

mg/L: Milligrams per Liter.

SU: Standard Units.

pCi/L: Picocuries per Liter.

-- : Laboratory did not analyze sample for indicated constituent.

R: Resample event.

B: Target analyte or common lab contaminant was identified in the method blank.

D: Sample diluted due to targets detected over highest point of calibration curve or due to matrix interference.

J: Analyte detected above method (sample)

H: Bias in sample result likely to be high.

NR: Analysis of this constituent not required for detection monitoring.

L: Bias in sample result likely to be low.

U: Analyte not detected at laboratory reporting limit (Sample Detection Limit).

X: Matrix Spike/Matrix Spike Duplicate recoveries were found to be outside of the laboratory control limits.

TABLE 3
Groundwater Analytical Results Summary
CPS Energy - Calaveras Power Station
Evaporation Pond

		JKS-36 Downgradient																			
Sample Date		12/8/16	2/23/17	3/29/17	5/4/17	6/21/17	7/26/17	8/30/17	10/11/17	4/5/18	10/30/18	4/10/19	10/22/19	4/29/20	10/21/20	4/14/21	10/19/21	4/13/22	10/25/22	04/18/23	10/17/23
Task		Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 11	Event 12	Event 13	Event 14	Event 15	Event 16	Event 17	Event 18	Event 19	Event 20
Constituents	Unit	Dec 2016	Feb 2017	Mar 2017	May 2017	Jun 2017	Jul 2017	Aug 2017	Oct 2017	Apr 2018	Oct 2018	Apr 2019	Oct 2019	Apr 2020	Oct 2020	Apr 2021	Oct 2021	Apr 2022	Oct 2022	April 2023	Oct 2023
Appendix III - Detection Monitoring																					
Boron	mg/L	0.308	0.671	0.748	0.731	0.581	0.625 JH	0.663	0.637	0.625	0.686	0.663	0.632	0.459	0.456 JL	0.436	0.630	0.556	0.431	0.415 JL	0.368 JL
Calcium	mg/L	69.7	165	147	282	247	255 JHX	241	289	281	311 D	315 D	265 D	175	259	268	299	260	173	166	168
Chloride	mg/L	14.5	199 D	37.0	355	364 D	379 JHD	319 D	328	347 X	313	285	274	63.3	319	316	260	295	383	341	0.052 U
Fluoride	mg/L	0.0360 U	0.439 JH	0.330	1.53	1.26	1.37 JH	1.30	1.32	1.95 X	1.47	1.45	1.41	1.18	1.07	1.02	0.018 U	1.71	1.73	1.30	0.517
Sulfate	mg/L	49.2	409 D	271 D	726	731 D	775 JHD	707 D	741	816 X	946	697	756 D	189	890	923	727	769	1080	950	838 J
pH - Field Collected	SU	6.71	4.96	6.98	4.04	3.72	3.80	5.20	3.24	3.48	3.61	3.71	3.66	3.42	3.98	4.29	5.96	6.78	4.41	4.55	6.99
Total dissolved solids	mg/L	368	1010	591	1610	1820	1700 JH	1220	1770	1650	1630	1520	1600	1790	1930	2100	1640	2200	2410	2020	1940 JL
Appendix IV - Assessment Monitoring																					
Antimony	mg/L	0.00120 U	0.000240 U	0.00123 J	0.00120 U	0.000240 U	0.00121 J	0.000240 U	0.000240 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Arsenic	mg/L	0.00123 U	0.000588 J	0.00134 J	0.00324 J	0.00276	0.00369	0.00341	0.00372	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Barium	mg/L	0.0988	0.0967	0.139	0.0270	0.0187	0.0207	0.0372	0.0225	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Beryllium	mg/L	0.000654 U	0.00198 J	0.000131 U	0.0259	0.0226	0.0261	0.0212	0.0259	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cadmium	mg/L	0.00257 J	0.00510	0.000548 J	0.0118	0.0102	0.0117	0.0101	0.0113	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Chromium	mg/L	0.00262 U	0.00608	0.0409	0.0100 J	0.00968	0.0156	0.00792	0.0132	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Cobalt	mg/L	0.000579 J	0.0871	0.00751	0.220	0.186	0.216	0.195	0.215	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Fluoride	mg/L	0.0360 U	0.439 JH	0.330	1.53	1.26	1.37 JH	1.30	1.32	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Lead	mg/L	0.000758 U	0.000152 U	0.000152 U	0.000758 U	0.000164 J	0.000220 J	0.000261 J	0.000152 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Lithium	mg/L	0.0123 J	0.119	0.00238 U	0.326	0.340	0.371	0.372	0.379	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Mercury	mg/L	0.000834	0.000289	0.00143	0.00240	0.00244	0.00160	0.00113	0.00226	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Molybdenum	mg/L	0.00397 J	0.00261	0.0686	0.00183 J	0.000704 J	0.000791 J	0.00151 J	0.000255 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Selenium	mg/L	0.0334	0.0448	0.0313	0.0673	0.0616	0.0697	0.0633	0.0663	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Thallium	mg/L	0.00166 U	0.000487 J	0.000332 U	0.00166 U	0.000876 J	0.00114 J	0.000889 J	0.000332 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-226	pCi/L	0.0888 ± 0.151	1.12 ± 0.342	0.453 ± 0.276	4.85 ± 0.656	4.02 ± 0.608	4.32 ± 0.667	6.28 ± 0.845	3.6 ± 0.600	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-228	pCi/L	2.14 ± 1.02	2.17 ± 0.979	0.166 ± 0.861 U	4.28 ± 1.19	3.44 ± 1.04	3.95 ± 1.79	2.63 ± 0.928	3.3 ± 1.33	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR
Radium-226/228 Combined	pCi/L	2.2288 ± 1.171	3.29 ± 1.321	0.619 ± 1.137 U	9.13 ± 1.846	7.46 ± 1.648	8.27 ± 2.457	8.91 ± 1.773	6.9 ± 1.93	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR

NOTES:

(A) JKS-63 plugged and abandoned and replaced with JKS-63R on 5/2/19. Sample events 1 through 10 collected from JKS-63 and thereafter from JKS-63R.

(1) Sample not collected due to the well going dry during sampling activities.

(2) Sample not collected due to blockage in the well casing.

mg/L: Milligrams per Liter.

SU: Standard Units.

pCi/L: Picocuries per Liter.

-- : Laboratory did not analyze sample for indicated constituent.

R: Resample event.

B: Target analyte or common lab contaminant was identified in the method blank.

D: Sample diluted due to targets detected over highest point of calibration curve or due to matrix interference.

J: Analyte detected above method (sample)

H: Bias in sample result likely to be high.

NR: Analysis of this constituent not required for detection monitoring.

L: Bias in sample result likely to be low.

U: Analyte not detected at laboratory reporting limit (Sample Detection Limit).

X: Matrix Spike/Matrix Spike Duplicate recoveries were found to be outside of the laboratory control limits.

TABLE 3
Groundwater Analytical Results Summary
CPS Energy - Calaveras Power Station
Evaporation Pond

		JKS-61 Downgradient																							
Sample Date		12/7/16	2/23/17	3/29/17	5/3/17	6/21/17	7/26/17	8/30/17	10/11/17	4/5/18	10/31/18	2/5/19	4/10/19	10/22/19	2/25/20	4/29/20	10/21/20	4/13/21	10/19/21	2/22/22	4/13/22	10/25/22	04/19/23	10/17/23	
Task		Event 1	Event 2	Event 3	Event 4	Event 5	Event 6	Event 7	Event 8	Event 9	Event 10	Event 10R	Event 11	Event 12	Event 12R	Event 13	Event 14	Event 15	Event 16	Event 16R	Event 17	Event 18	Event 19	Event 20	
Constituents		Unit	Dec 2016	Feb 2017	Mar 2017	May 2017	Jun 2017	Jul 2017	Aug 2017	Oct 2017	Apr 2018	Oct 2018	Feb 2019	Apr 2019	Oct 2019	Feb 2020	Apr 2020	Oct 2020	Apr 2021	Oct 2021	Feb 2022	Apr 2022	Oct 2022	April 2023	Oct 2023
Appendix III - Detection Monitoring																									
Boron	mg/L	1.07	1.29	1.15	1.18	0.960	1.01 JH	0.994	0.997	1.09	3.25	3.12	2.72	2.90	2.30	1.82	1.82 JL	1.57	1.95	1.86	1.83	1.33	1.06	1.01 JL	
Calcium	mg/L	134	95.9	155	113	115	107 JH	105	135	171	197 D	--	176	168 D	--	154	172	122	130	--	144	104	71.2	82.4	
Chloride	mg/L	198	158	162	168	193	190 JH	218 D	210	285	213	--	253	248	--	312	281	204	207	--	248	201	150	0.052 U	
Fluoride	mg/L	0.393	0.503	0.522	0.643 JH	0.459 JH	0.479 JH	0.0960 U	0.0360 U	0.406 J	0.430 J	--	0.403 J	0.480 J	--	0.494	0.366	0.216	0.018 U	--	0.363	0.018 U	0.355	0.445	
Sulfate	mg/L	401 D	377 JD	382 D	388	408 D	390 JHD	385 D	401	562	548	--	619	548 D	--	604	533	393	397	--	420	407	331	274 J	
pH - Field Collected	SU	6.72	6.51	6.48	6.68	6.53	6.55	7.40	6.27	6.42	6.38	6.37	6.52	5.61	5.7	6.27	6.57	6.40	6.52	6.58	6.83	7.10	5.96	7.51	
Total dissolved solids	mg/L	1400	1180	1190	1260	1430	1290 JH	1170	1280	1620	514	1620	1650	1790	--	1870	2000	1320	1380	--	1410	1280	1090	993 JL	
Appendix IV - Assessment Monitoring																									
Antimony	mg/L	0.00120 U	0.000240 U	0.000240 U	0.00120 U	0.000240 U	0.000240 U	0.000240 U	0.000240 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Arsenic	mg/L	0.00123 U	0.000768 J	0.000709 J	0.00123 U	0.000563 J	0.000622 J	0.000569 J	0.000246 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Barium	mg/L	0.0364	0.0186	0.0173	0.0178 J	0.0148	0.0167	0.0153	0.0162	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Beryllium	mg/L	0.000654 U	0.000131 U	0.000131 U	0.000654 U	0.000131 U	0.000131 U	0.000131 U	0.000131 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Cadmium	mg/L	0.000734 U	0.000147 U	0.000147 U	0.000734 U	0.000147 U	0.000147 U	0.000147 U	0.000147 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Chromium	mg/L	0.00262 U	0.000911 J	0.000525 U	0.00262 U	0.000525 U	0.000604 J	0.000808 J	0.000525 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Cobalt	mg/L	0.000719 J	0.000725 J	0.000769 J	0.000779 J	0.000805 J	0.000765 J	0.000855 J	0.0000699 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Fluoride	mg/L	0.393	0.503	0.522	0.643 JH	0.459 JH	0.479 JH	0.0960 U	0.0360 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Lead	mg/L	0.000758 U	0.000152 U	0.000152 U	0.000758 U	0.000152 U	0.000152 U	0.000152 U	0.000152 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Lithium	mg/L	0.000476 U	0.0158 J	0.00238 U	0.0120 J	0.0342	0.0336	0.0443	0.0335	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Mercury	mg/L	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Molybdenum	mg/L	0.00165 J	0.00129 J	0.000984 J	0.00128 U	0.000776 J	0.000742 J	0.000712 J	0.000255 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Selenium	mg/L	0.00227 U	0.00123 J	0.00123 J	0.00227 U	0.00185 J	0.00154 J	0.00172 J	0.000454 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Thallium	mg/L	0.00166 U	0.000332 U	0.000332 U	0.00166 U	0.000332 U	0.000332 U	0.000332 U	0.000332 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Radium-226	pCi/L	1.15 ± 0.429	0.723 ± 0.306	0.256 ± 0.237 U	0.237 ± 0.193	0.398 ± 0.239	0.511 ± 0.223	0.821 ± 0.324	0.485 ± 0.212	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Radium-228	pCi/L	2.79 ± 1.44	0.358 ± 1.06	0.761 ± 0.688 U	-0.064 ± 0.607	2.03 ± 0.997	0.491 ± 0.813	0.247 ± 0.710	1.64 ± 1.08	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	
Radium-226/228 Combined	pCi/L	3.94 ± 1.869	1.081 ± 1.366	1.017 ± 0.925 U	0.173 ± 0.800	2.428 ± 1.236	1.002 ± 1.036	1.068 ± 1.034	2.125 ± 1.292	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	

NOTES:
(A) JKS-63 plugged and abandoned and replaced with JKS-63R on 5/2/19. Sample events 1 through 10 collected from JKS-63 and thereafter from JKS-63R.
(1) Sample not collected due to the well going dry during sampling activities.
(2) Sample not collected due to blockage in the well casing.
mg/L: Milligrams per Liter.
SU: Standard Units.
pCi/L: Picocuries per Liter.
-- : Laboratory did not analyze sample for indicated constituent.
R: Resample event.
B: Target analyte or common lab contaminant was identified in the method blank.
D: Sample diluted due to targets detected over highest point of calibration curve or due to matrix interference.
J: Analyte detected above method (sample)
H: Bias in sample result likely to be high.
NR: Analysis of this constituent not required for detection monitoring.
L: Bias in sample result likely to be low.
U: Analyte not detected at laboratory reporting limit (Sample Detection Limit).
X: Matrix Spike/Matrix Spike Duplicate recoveries were found to be outside of the laboratory control limits.

TABLE 3
Groundwater Analytical Results Summary
CPS Energy - Calaveras Power Station
Evaporation Pond

		JKS-62 Downgradient																				JKS-72 Downgradient
Sample Date Task		12/8/16 Event 1 Dec 2016	2/23/17 Event 2 Feb 2017	3/29/17 Event 3 Mar 2017	5/4/17 Event 4 May 2017	6/21/17 Event 5 Jun 2017	7/26/17 Event 6 Jul 2017	8/30/17 Event 7 Aug 2017	10/11/17 Event 8 Oct 2017	4/5/18 Event 9 Apr 2018	10/30/18 Event 10 Oct 2018	4/10/19 Event 11 Apr 2019	10/23/19 Event 12 Oct 2019	4/29/20 Event 13 Apr 2020	11/17/20 Event 14 Nov 2020	4/14/21 Event 15 Apr 2021	10/19/21 Event 16 Oct 2021	4/13/22 Event 17 Apr 2022	-- Event 18 Oct 2022	-- Event 19 April 2023	-- Event 20 Oct 2023	10/17/23 Event 1 Oct 2023
Constituents	Unit																					
Appendix III - Detection Monitoring																						
Boron	mg/L	0.549	0.481	0.597	0.601	0.501	0.485 JH	0.485	0.549	0.522	0.559	0.612	0.528	0.484	0.537	0.541	0.558	0.874	(1)	(1)	(1)	4.44
Calcium	mg/L	155	152	220	156	150	134 JH	150	158	160	161 D	205 D	151 D	122	144	149	159	25.1	(1)	(1)	(1)	388
Chloride	mg/L	257 D	279 DX	279 D	278	291 D	260 JHD	281 D	241	312	279	336	276	284	284	279	270	16.2	(1)	(1)	(1)	351
Fluoride	mg/L	0.246	0.362 JH	0.418	0.388	0.366 JH	0.342 JH	0.233 JH	0.0360 U	0.353 J	0.309 J	0.356 J	0.380 J	0.331	0.295	0.258	0.018 U	0.183	(1)	(1)	(1)	0.018 U
Sulfate	mg/L	190	187	193	188	184	181 JH	188 D	175	200	183	191	183	190	212	191	180	202	(1)	(1)	(1)	1710 J
pH - Field Collected	SU	6.79	6.67	6.63	6.71	6.68	6.82	7.51	6.52	6.72	6.58	6.29	5.43	6.54	6.55	6.61	6.67	6.89	(1)	(1)	(1)	7.88
Total dissolved solids	mg/L	1120	1170	1140	1100	1080	976 JH	1080	1080	1110	956	1190	1160	1100	1040	1100	1070	573	(1)	(1)	(1)	3150 JL
Appendix IV - Assessment Monitoring																						
Antimony	mg/L	0.000240 U	0.000240 U	0.000240 U	0.00120 U	0.000240 U	0.000240 U	0.000240 U	0.000240 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.002 UJL
Arsenic	mg/L	0.000684 J	0.000293 J	0.000246 U	0.00123 U	0.000254 J	0.000246 U	0.000246 U	0.000246 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.002 J
Barium	mg/L	0.0825	0.0786	0.0813	0.0747	0.0734	0.0737	0.0708	0.0793	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.054 JL
Beryllium	mg/L	0.000131 U	0.000131 U	0.000131 U	0.000654 U	0.000131 U	0.000131 U	0.000131 U	0.000131 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.0006 JL
Cadmium	mg/L	0.000147 U	0.000147 U	0.000147 U	0.000734 U	0.000147 U	0.000147 U	0.000147 U	0.000147 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.003 JL
Chromium	mg/L	0.00186 J	0.00109 J	0.000525 U	0.00262 U	0.000551 J	0.000691 J	0.00107 J	0.000525 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.001 JL
Cobalt	mg/L	0.00110 J	0.000198 J	0.000744 J	0.000350 U	0.000278 J	0.000211 J	0.0000699 U	0.0000699 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.012L
Fluoride	mg/L	0.246	0.362 JH	0.418	0.388	0.366 JH	0.342 JH	0.233 JH	0.0360 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.018 U
Lead	mg/L	0.000588 J	0.000152 U	0.000152 U	0.000758 U	0.000154 J	0.000152 U	0.000152 U	0.000152 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.008 J
Lithium	mg/L	0.000476 U	0.0129 J	0.00238 U	0.00134 J	0.0353	0.0305	0.0457	0.0263	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	160 J
Mercury	mg/L	0.0000540 J	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	0.0000263 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.0001 U
Molybdenum	mg/L	0.000414 J	0.000259 J	0.000255 U	0.00128 U	0.000255 U	0.000255 U	0.000255 U	0.000255 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.006 J
Selenium	mg/L	0.222	0.192	0.196	0.195	0.185	0.181	0.191	0.208	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.044
Thallium	mg/L	0.000332 U	0.000332 U	0.000332 U	0.00166 U	0.000332 U	0.000332 U	0.000332 U	0.000332 U	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	0.0009 U
Radium-226	pCi/L	0.485 ± 0.229	0.402 ± 0.220	0.665 ± 0.321	0.0997 ± 0.153	0.425 ± 0.233	0.399 ± 0.220	2.02 ± 0.489	0.669 ± 0.279	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	2.14 ± 0.483 JL
Radium-228	pCi/L	2.15 ± 1.38	1.53 ± 1.28 U	0.305 ± 1.10 U	-0.138 ± 0.656	0.66 ± 0.760	1.07 ± 0.949	0.673 ± 0.821	0.371 ± 0.631	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	3.59 ± 1.36 JL
Radium-226/228 Combined	pCi/L	2.635 ± 1.609	1.932 ± 1.5 U	0.97 ± 1.421 U	-0.038 ± 0.809	1.085 ± 0.993	1.469 ± 1.169	2.693 ± 1.31	1.04 ± 0.91	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	NR	5.73 ± 1.44 JL

NOTES:
(A) JKS-63 plugged and abandoned and replaced with JKS-63R on 5/2/19. Sample events 1 through 10 collected from JKS-63 and thereafter from JKS-63R.
(1) Sample not collected due to the well going dry during sampling activities.
(2) Sample not collected due to blockage in the well casing.
mg/L: Milligrams per Liter.
SU: Standard Units.
pCi/L: Picocuries per Liter.
-- : Laboratory did not analyze sample for indicated constituent.
R: Resample event.
B: Target analyte or common lab contaminant was identified in the method blank.
D: Sample diluted due to targets detected over highest point of calibration curve or due to matrix interference.
J: Analyte detected above method (sample)
H: Bias in sample result likely to be high.
NR: Analysis of this constituent not required for detection monitoring.
L: Bias in sample result likely to be low.
U: Analyte not detected at laboratory reporting limit (Sample Detection Limit).
X: Matrix Spike/Matrix Spike Duplicate recoveries were found to be outside of the laboratory control limits.

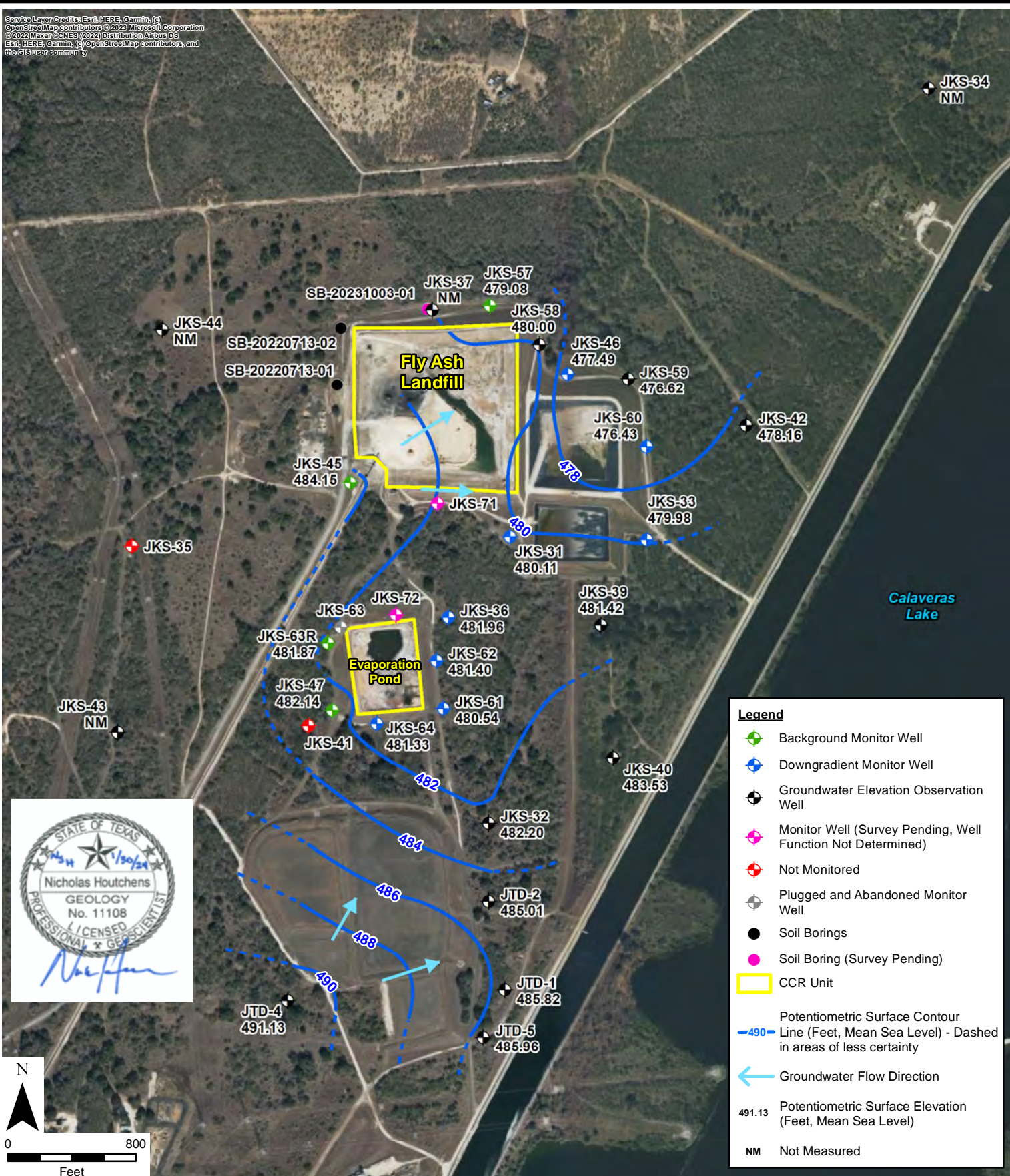


FIGURES

FIGURE 1 CCR WELL NETWORK LOCATION MAP

FIGURE 2A POTENTIOMETRIC SURFACE MAP – APRIL 2023

FIGURE 2A POTENTIOMETRIC SURFACE MAP – OCTOBER 2023



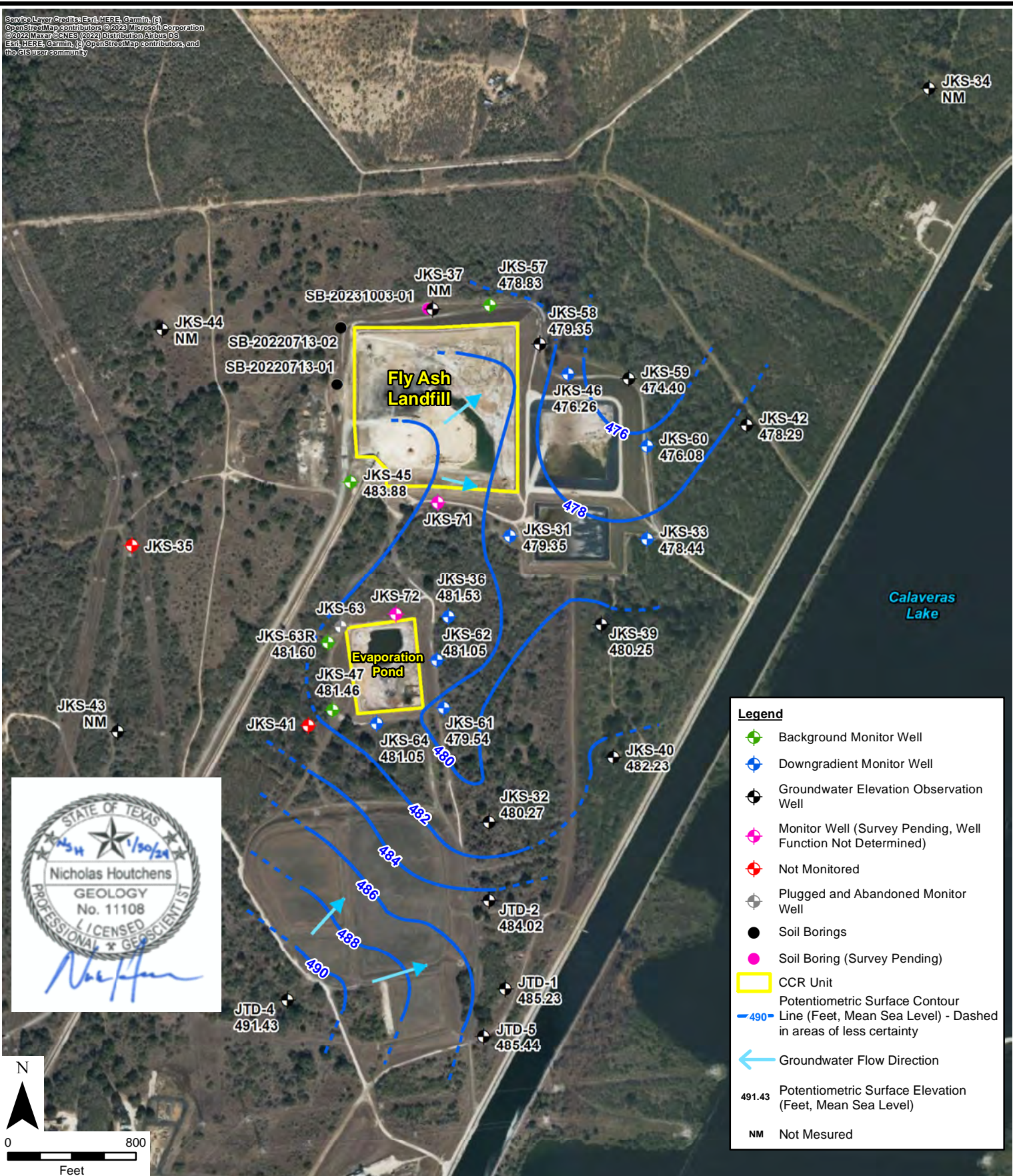
Environmental Resources Management

DESIGN:	NH	DRAWN:	LM	CHKD.:	WZ
DATE:	1/11/2024	SCALE:	AS SHOWN	REVISION:	0

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FIGURE 2A
POTENTIOMETRIC SURFACE MAP -
April 2023
Northern CCR Units
CPS Energy - Calaveras Power Station
San Antonio, Texas





Legend

- Background Monitor Well
- Downgradient Monitor Well
- Groundwater Elevation Observation Well
- Monitor Well (Survey Pending, Well Function Not Determined)
- Not Monitored
- Plugged and Abandoned Monitor Well
- Soil Borings
- Soil Boring (Survey Pending)
- CCR Unit
- Potentiometric Surface Contour Line (Feet, Mean Sea Level) - Dashed in areas of less certainty
- Groundwater Flow Direction
- Potentiometric Surface Elevation (Feet, Mean Sea Level)
- NM Not Mesured

Environmental Resources Management

DESIGN:	NH	DRAWN:	LM	CHKD.:	WZ
DATE:	1/11/2024	SCALE:	AS SHOWN	REVISION:	0

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Fig2B_0636109_CCR_NorthernPot_Oct2023.mxd

FIGURE 2B
POTENTIOMETRIC SURFACE MAP -
October 2023
Northern CCR Units
CPS Energy - Calaveras Power Station
San Antonio, Texas





APPENDIX A LABORATORY DATA PACKAGES

JANUARY 2024

Data Usability Summary
Sampling Event/April 2023

CPS Energy Calaveras Power Station
Coal Combustion Residuals (CCR) Units
San Antonio, Texas

This data usability summary (DUS) was prepared in general accordance with the following key documents:

- 1) *Groundwater Sampling and Analysis Program*, CPS Energy, Calaveras Power Station (ERM, January 2022);
- 2) Texas Commission on Environmental Quality's (TCEQ's) *Review and Reporting of COC Concentration Data Under TRRP* (RG-366/TRRP-13, May 2010); and
- 3) Environmental Protection Agency's (EPA's) *National Functional Guidelines for Inorganic Superfund Methods Data Review* (EPA-540-R-2017-001, January 2017).

Environmental Resources Management (ERM) reviewed four laboratory analytical data packages (2304292, 2304293, 2304294, and 2304295) from San Antonio Testing Laboratory (SATL) of San Antonio, Texas for the analysis of ground water samples collected on 18 April to 19 April 2023 at the CPS Energy Calaveras Power Station in San Antonio, Texas. Analytes Radium-226, Radium-228, and Lithium were subbed to Eurofins of St. Louis by SATL for analysis. Data were reviewed to assess conformance with the requirements of the above-referenced documents.

SATL and Eurofins are NELAC-accredited under the Texas Laboratory Accreditation Program for the matrices, analytes, and methods of analysis requested on the chain-of-custody documentation. SATL and Eurofins National Environmental Laboratory Accreditation Program (NELAP) certificates applicable to the period during which the laboratories generated the data in these reports is referenced in the laboratory reports.

Intended Use of Data: To provide concentration data on Appendix III Coal Combustion Residuals (CCR) Rule parameters in ground water at the CPS Energy Calaveras Facility.

Analyses requested for the laboratory packages include the following:

- EPA 300.0 – Inorganic Anions (Chloride, Fluoride, Sulfate) by Ion Chromatography (IC)
- EPA 6010B – Total Metals by Inductively Coupled Plasma-Atomic Emission Spectroscopy (ICP-AES)
- EPA 903.0 and 904.0 – Radium-226 and Radium-228 (GFPC)
- EPA 6010A – Total Metals (Lithium) ICP
- SW846 7470A – Mercury (CVAA)

Data were reviewed and validated as described in the above-referenced documents, and the results of the review/validation are discussed in this Data Usability Summary (DUS). The following laboratory submittals and field data were examined:

- The reportable data;
- The laboratory review checklist (LRC) and associated exception report (ER); and
- The Quality Assurance/Quality Control (QA/QC) data supplied by the laboratory.

The results of supporting QC analyses are summarized on the LRC and ER, which are included in this review. The LRC, associated ER, QA/QC data, and reportable data covered by this review are included in the laboratory reports.

The Laboratory Data Package Cover Pages and Laboratory Review Checklists provided in the analytical data packages are outdated and inconsistent with current TRRP-13 guidance (May 2010). It is highly recommended that required items in the current TRRP-13 guidance be followed for laboratory data packages generated to satisfy corrective action program requirements. Data were not qualified based on this deficiency.

Introduction

Twenty-five (25) groundwater samples, three (3) duplicate samples, two (2) field blanks, and one (1) equipment blank were analyzed for select metals and anions. Six (6) groundwater samples, one duplicate sample, and one field blank was also analyzed for Radium and Lithium. Table 1 lists the sample identifications cross-referenced to laboratory identifications.

Project Data Quality Objectives (DQO)

The quantitative project DQO limits specified in the *Groundwater Sampling and Analysis Program* were utilized as follows:

- Recovery (%R)
 - Spike samples 75-125%
 - Non-spike samples 70-130%
- Relative Percent Difference (RPD) <20%

Data were qualified in accordance with the TCEQ's TRRP-13 guidance document, including data qualifier codes and data qualifier code definitions.

Data Review / Validation Results

Analytical Results

Ground water analytical results were reported in milligrams per liter (mg/L) for metals and anions. Analytical results from Eurofins was reported in micrograms per liter (µg/L) for metals and in picocuries per liter (pCi/L) for radiological analysis. Non-detect results are reported as less than the value of the sample detection limits (SDLs). The method quantitation limits (MQLs) are also reported.

Preservation and Holding Times

The samples were evaluated for agreement with the chain-of-custody forms. The samples were received in the appropriate containers and in good condition with the paperwork properly completed.

Sample receipt temperature of the cooler at SATL were within or less than the acceptance criteria of 4 +/- 2 degrees Celsius. Sample receipt temperature for lab reports 2304292, 2304293, 2304294, and 2304295 were 2.2°C, 2.2°C, 0.4°C, and 1.4°C, respectively. No qualifiers were added to the data. Samples were prepared and analyzed within holding times as specified by the methods. The samples were preserved in the field as specified by the methods, with the following exception.

For radium analysis, the reference method required samples to be preserved to a pH of <2. If samples are collected without preservation, they must be received by the laboratory within 5 days for preservation according to Method 904 specifications. All the samples in lab report 2304295 and one sample, JKS-70-20230419-CCR, in lab report 2304294 was received by the laboratory unpreserved 6-7 days after the samples were collected. The sample was preserved to the appropriate pH in the laboratory; however, the analytical results were still qualified as JL, estimated low, for detected results and UJL, non-detect and estimated low for non-detect results for radium.

Calibrations

According to the LRC, initial calibrations, continuing calibrations, and calibration verifications data met method requirements for metals and anions, as applicable.

Mass Spectral Tuning

As documented in the LRC, mass spectrometry instrument performance tunes were either not applicable (appropriate compound for the method) or met specific requirements for the requested analytical methods (ion abundance data within limits).

Internal Standards

As documented in the LRC, internal standard area counts and retention times were within or not applicable for the requested analytical methods.

Percent Yield

Ba and Y Carrier percent yields for radium analysis were within laboratory acceptance limits.

Blanks

Metals and anions were not detected in the method blanks.

Laboratory Control Samples

Laboratory control sample and duplicate (LCS/LCSD) precision and accuracy results (*i.e.*, percent recoveries and RPDs) for all analyses were within project DQO acceptance limits, with the following exception.

In laboratory packages 2304294 and 2304295, the LCS percent recovery in prep batch 610073 were above DQO acceptance limits for Radium-228 (135%). Affected samples in batch 610073 (all samples in laboratory package 2304295 and JKS-70-20230419-CCR) with detected results would typically be qualified as JH, estimated with high bias. However, as the samples were previously qualified as JL for insufficient preservation, the affected sample results were qualified as J, estimated.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicate (MS/MSD) precision and accuracy results (*i.e.*, percent recoveries and RPDs) using project samples were within project DQO acceptance limits, with the following exceptions.

In laboratory packages 2304292 and 2304293, matrix spike/matrix spike duplicate (MS/MSD) analysis was performed on project samples JKS-45-20230418-CCR for anions and JKS-36-20230418-CCR and JKS-60-20230419-CCR for metals. The MS and MSD had recoveries above laboratory and DQO limits for chloride and below laboratory and DQO limits for boron. The parent concentration for chloride, calcium, and sulfate were greater than four times the amount spiked into it; therefore, no qualifiers were required for high MS/MSD recoveries for chloride or for NR-flagged recoveries for calcium and sulfate. The MS and MSD recoveries for metals were run on two project-related samples in the same batch. The MS/MSD recoveries for boron were below DQO limits associated with sample JKS-36-20230418-CCR; however, MS/MSD recoveries were within DQO limits associated with sample JKS-60-20230419-CCR in the same batch. As such, only the parent sample, JKS-36-20230418-CCR, was qualified as estimated with low bias (JL) for boron due to low MS/MSD recoveries.

In laboratory packages 2304294 and 2304295, matrix spike/matrix spike duplicate (MS/MSD) analysis was performed on project samples JKS-65-20230418-FPDP and JKS-66-20230419-FPDP for anions, JKS-70-20230419-CCR for mercury, JKS-36-20230418-CCR and JKS-60-20230419-CCR for select metals (boron and calcium), and JKS-56-20230419-CCR and FB-003-20230419 for all metals. The MS and MSD had recoveries above DQO limits for chloride, calcium (Batch B317141), and sulfate and below DQO limits for boron and calcium (Batch B317142). The parent concentration for calcium (both batches), and sulfate were greater than four times the amount spiked into it; therefore, no qualifiers were required for high or low MS/MSD recoveries for sulfate and calcium or for NR-flagged recoveries for calcium. In batch B318130 MS/MSD recoveries for chloride using project-related sample JKS-66-20230419-FPDP was higher than DQO acceptance limits and the spiking amount was not greater than four times the amount spiked into it; as such, samples in the batch were qualified as estimated with high bias (JH) for chloride due to high MS/MSD recoveries. The MS and MSD recoveries for metals (boron and calcium) were run on two project-related samples in the same batch. The MS/MSD recoveries for boron were below DQO limits associated with sample JKS-36-20230418-CCR; however, MS/MSD recoveries were within DQO limits associated with sample JKS-60-20230419-CCR in the same batch. As such, only the parent sample, JKS-36-20230418-CCR was qualified as estimated with low bias (JL) for boron due to low MS/MSD recoveries.

Post Digestion Spike

According to the LRC, post digestion spike (PDS) recoveries were within method acceptance limits.

Serial Dilution

According to the LRC, serial dilution (SD) percent differences (%D) were within method acceptance limits.

Laboratory Precision

Laboratory duplicate RPD using project samples were within project DQO acceptance limits, with the following exception.

In laboratory packages 2304294 and 2304295, the laboratory duplicate RPD for arsenic in batch B317142, performed on project sample JKS-56-20230419-CCR, was higher than DQO acceptance limits. The analyte concentration was less than five times the MQL and all affected sample results were less than the value of the MQL; as such, no qualifiers were required.

Field Precision

Three pairs of field precision samples were collected during the April 2023 event (JKS-33-20230419-CCR / DUP-001-20230419; JKS-48-20230419-CCR / DUP-002-20230419; JKS-68-20230418-FPDP / DUP-001-20230418). RPD calculations for detected analytes for each field precision pair are shown in Table 2. All RPD were within DQO limits or had sample concentrations less than two times the value of the MQL; as such, no qualifiers were required.

Field Procedures

Sample collection procedures were in accordance with EPA ground water sampling protocols and the *Ground Water Sampling and Analysis Program*, dated January 2022.

SUMMARY

Ground water analytical results are useable for the purpose of provide concentration data on Appendix III Coal Combustion Residuals (CCR) Rule parameters in ground water at the CPS Energy Calaveras Power Station. Table 2 lists qualified data.

Tables

TABLE 1
Sample Cross-Reference

CPS Energy
Calaveras Power Station

Lab Report	Lab Identification	Field Identification	Sample Date	Sample Type
2304292	2304292-01	JKS-36-20230418-CCR	4/18/2023	Groundwater
2304292	2304292-02	JKS-47-20230419-CCR	4/19/2023	Groundwater
2304292	2304292-03	JKS-61-20230419-CCR	4/19/2023	Groundwater
2304292	2304292-04	JKS-63R-20230418-CCR	4/18/2023	Groundwater
2304292	2304292-05	JKS-64-20230419-CCR	4/19/2023	Groundwater
2304292	2304292-06	EB-001-20230419	4/19/2023	Equipment Blank
2304293	2304293-01	JKS-31-20230418-CCR	4/18/2023	Groundwater
2304293	2304293-02	JKS-33-20230419-CCR	4/19/2023	Groundwater
2304293	2304293-03	JKS-45-20230418-CCR	4/18/2023	Groundwater
2304293	2304293-04	JKS-46-20230418-CCR	4/18/2023	Groundwater
2304293	2304293-05	JKS-60-20230419-CCR	4/19/2023	Groundwater
2304293	2304293-06	DUP-001-20230419	4/19/2023	Duplicate Sample
2304293	2304293-07	FB-001-20230419	4/19/2023	Field Blank
2304294	2304294-01	JKS-48-20230419-CCR	4/19/2023	Groundwater
2304294	2304294-02	JKS-49-20230418-CCR	4/18/2023	Groundwater
2304294	2304294-03	JKS-50R-20230418-CCR	4/18/2023	Groundwater
2304294	2304294-04	JKS-51-20230419-CCR	4/19/2023	Groundwater
2304294	2304294-05	JKS-52-20230419-CCR	4/19/2023	Groundwater
2304294	2304294-06	JKS-53-20230419-CCR	4/19/2023	Groundwater
2304294	2304294-07	JKS-54-20230419-CCR	4/19/2023	Groundwater
2304294	2304294-08	JKS-55-20230418-CCR	4/18/2023	Groundwater
2304294	2304294-09	JKS-56-20230419-CCR	4/19/2023	Groundwater
2304294	2304294-10	JKS-70-20230419-CCR	4/19/2023	Groundwater
2304294	2304294-11	DUP-002-20230419	4/19/2023	Duplicate Sample
2304294	2304294-12	FB-002-20230419	4/19/2023	Field Blank
2304295	2304295-01	JKS-65-20230418-FPDP	4/18/2023	Groundwater
2304295	2304295-02	JKS-66-20230419-FPDP	4/19/2023	Groundwater
2304295	2304295-03	JKS-67-20230418-FPDP	4/18/2023	Groundwater
2304295	2304295-04	JKS-68-20230418-FPDP	4/18/2023	Groundwater
2304295	2304295-05	JKS-69-20230418-FPDP	4/18/2023	Groundwater
2304295	2304295-06	DUP-001-20230418	4/18/2023	Duplicate Sample
2304295	2304295-07	FB-003-20230419	4/19/2023	Field Blank

TABLE 2
Data Usability Qualifiers

CPS Energy
Calaveras Power Station

Lab Report	Field ID	Parameter	Qualification	Rationale
2304292	JKS-36-20230418-CCR	Boron	JL	Low MS/MSD Recovery
2304294	JKS-70-20230419-CCR	Arsenic	JH	High Field Precision RPD
2304294	JKS-48-20230419-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-49-20230418-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-50R-20230418-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-51-20230419-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-52-20230419-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-53-20230419-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-54-20230419-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-55-20230418-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-56-20230419-CCR	Chloride	JH	High MS/MSD Recovery
2304294	JKS-70-20230419-CCR	Chloride	JH	High MS/MSD Recovery
2304294	DUP-002-20230419	Chloride	JH	High MS/MSD Recovery
2304295	JKS-65-20230418-FPDP	Chloride	JH	High MS/MSD Recovery
2304295	JKS-66-20230419-FPDP	Chloride	JH	High MS/MSD Recovery
2304295	JKS-67-20230418-FPDP	Chloride	JH	High MS/MSD Recovery
2304295	JKS-68-20230418-FPDP	Chloride	JH	High MS/MSD Recovery
2304295	JKS-69-20230418-FPDP	Chloride	JH	High MS/MSD Recovery
2304295	DUP-001-20230418	Chloride	JH	High MS/MSD Recovery
2304295	JKS-65-20230418-FPDP	Radium-226	JL	Outside Preservation Holding Time
2304295	JKS-66-20230419-FPDP	Radium-226	JL	Outside Preservation Holding Time
2304295	JKS-67-20230418-FPDP	Radium-226	JL	Outside Preservation Holding Time
2304295	JKS-68-20230418-FPDP	Radium-226	UJL	Outside Preservation Holding Time
2304295	JKS-69-20230418-FPDP	Radium-226	JL	Outside Preservation Holding Time
2304295	DUP-001-20230418	Radium-226	JL	Outside Preservation Holding Time
2304295	FB-003-20230419	Radium-226	UJL	Outside Preservation Holding Time
2304294	JKS-70-20230419-CCR	Radium-226	JL	Outside Preservation Holding Time
2304295	JKS-65-20230418-FPDP	Radium-228	J	Outside Preservation Holding Time and High LCS
2304295	JKS-66-20230419-FPDP	Radium-228	J	Outside Preservation Holding Time
2304295	JKS-67-20230418-FPDP	Radium-228	UJL	Outside Preservation Holding Time
2304295	JKS-68-20230418-FPDP	Radium-228	J	Outside Preservation Holding Time and High LCS
2304295	JKS-69-20230418-FPDP	Radium-228	J	Outside Preservation Holding Time and High LCS
2304295	DUP-001-20230418	Radium-228	J	Outside Preservation Holding Time and High LCS
2304295	FB-003-20230419	Radium-228	UJL	Outside Preservation Holding Time
2304294	JKS-70-20230419-CCR	Combined Radium	JL	Outside Preservation Holding Time and High LCS
2304295	JKS-65-20230418-FPDP	Combined Radium	JL	Outside Preservation Holding Time
2304295	JKS-66-20230419-FPDP	Combined Radium	JL	Outside Preservation Holding Time
2304295	JKS-67-20230418-FPDP	Combined Radium	JL	Outside Preservation Holding Time
2304295	JKS-68-20230418-FPDP	Combined Radium	JL	Outside Preservation Holding Time
2304295	JKS-69-20230418-FPDP	Combined Radium	JL	Outside Preservation Holding Time
2304295	DUP-001-20230418	Combined Radium	JL	Outside Preservation Holding Time
2304295	FB-003-20230419	Combined Radium	UJL	Outside Preservation Holding Time
2304294	JKS-70-20230419-CCR	Combined Radium	JL	Outside Preservation Holding Time

Notes:

J = Estimated

UJ = Non-detect Estimated

TABLE 3
Field Precision

CPS Energy
Calaveras Power Station

Lab Report	Field Duplicate Pair	Parameter	Sample Result	Duplicate Result	RPD	Qualifier
2304293	JKS-33-20230419- CCR / DUP-001- 20230419	TDS	3680	3630	1.37	A
		Chloride	732	752	2.70	A
		Sulfate	1550	1600	3.17	A
		Boron	0.988	0.996	0.81	A
		Calcium	376	386	2.62	A
2304294	JKS-48-20230419- CCR / DUP-002- 20230419	TDS	1370	1400	2.17	A
		Chloride	434	470	7.96	A
		Fluoride	0.964	0.975	1.13	A
		Sulfate	182	197	7.92	A
		Boron	1.93	1.97	2.05	A
		Calcium	118	120	1.68	A
2304295	JKS-68-20230418- FPDP / DUP-001- 20230418	TDS	4080	3970	2.73	A
		Chloride	861	866	0.58	A
		Fluoride	0.864	0.959	10.42	A
		Sulfate	1290	1230	4.76	A
		Boron	1.29	1.24	3.95	A
		Calcium	244	239	2.07	A
		Arsenic	0.002	J 0.0006	U 107.69	A*
		Barium	0.029	0.028	3.51	A
		Cadmium	0.0008	J 0.001	J 22.22	A*
		Chromium	0.002	J 0.002	J 0.00	A
		Molybdenum	0.0005	J 0.0004	J 22.22	A*
		Selenium	0.039	0.043	9.76	A
		Radium-226	0.108	U 0.165	41.76	A*
		Radium-228	1.41	0.749	61.23	A*
		Combined Radium-226 and 228	1.51	0.914	49.17	A*

Notes:

RPD - Relative Percent Difference

RPD = (Sample Result - Duplicate Result) x 200 / (Sample Result + Duplicate Result)

Qualifier: A = Acceptable (no qualification necessary)

A* = Acceptable data based on sample concentrations less than two times the MQL

J = Estimated

May 03, 2023

Chelsey Vasbinder

CPS Energy - Environmental Dept.

P.O. Box 1771

San Antonio, TX 78296-1771

SATL Report No.: 2304292

RE: Calaveras Power Station-CCR Units Evaporation Pond

Dear Chelsey Vasbinder

SATL received 6 Sample(s) on 04/20/2023 for analyses identified on the chain of custody. The analyses were performed using methods indicated on the laboratory report. Any deviations observed at sample receiving are notated on the Sample Receipt Checklist and/or Chain of Custody documents attached as part of this analytical report.

Sincerely,

For San Antonio Testing Laboratory, Inc.



Richard Hawk,
General Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Appendix A Laboratory Data Package Cover Page

This data package consists of:

- ☒ This signature page, the laboratory review checklist, and the following reportable data:
- ☒ R1 Field chain-of-custody documentation;
- ☒ R2 Sample identification cross-reference;
- ☒ R3 Test reports (analytical data sheets) for each environmental sample that includes:
 - a) Items consistent with NELAC 5.13 or ISO/IEC 17025 Section 5.10
 - b) dilution factors,
 - c) preparation methods,
 - d) cleanup methods, and
 - e) if required for the project, tentatively identified compounds (TICs).
- ☒ R4 Surrogate recovery data including:
 - a) Calculated recovery (%R), and
 - b) The laboratory's surrogate QC limits.
- ☒ R5 Test reports/summary forms for blank samples;
- ☒ R6 Test reports/summary forms for laboratory control samples (LCSs) including:
 - a) LCS spiking amounts,
 - b) Calculated %R for each analyte, and
 - c) The laboratory's LCS QC limits.
- ☒ R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
 - a) Samples associated with the MS/MSD clearly identified,
 - b) MS/MSD spiking amounts,
 - c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
 - d) Calculated %Rs and relative percent differences (RPDs), and
 - e) The laboratory's MS/MSD QC limits
- ☒ R8 Laboratory analytical duplicate (if applicable) recovery and precision:
 - a) the amount of analyte measured in the duplicate,
 - b) the calculated RPD, and
 - c) the laboratory's QC limits for analytical duplicates.
- ☒ R9 List of method quantitation limits (MQLs) for each analyte for each method and matrix;
- ☒ R10 Other problems or anomalies.
- ☒ The Exception Report for every "No" or "Not Reviewed (NR)" item in laboratory review checklist.

Release Statement: I am responsible for the release of this laboratory data package. This data package has been reviewed by the laboratory and is complete and technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached exception reports. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory as having the potential to affect the quality of the data, have been identified by the laboratory in the Laboratory Review Checklist, and no information or data have been knowingly withheld that would affect the quality of the data.

Aimee Landon For Marcela Gracia Hawk, President



Richard Hawk, General Manager

05/03/23 17:26

Date/Time

Project Name: Calaveras Power Station-CCR Units Evaporation Pond
Laboratory Job Number: 2304292

Reviewer Name: JA,SG,XE
Matrix :

RG-366/TRRP-13 December 2002

1610 S. Laredo Street, San Antonio, Texas 78207-7029 (210) 229-9920 Fax (210) 229-9921

www.satestinglab.com

Appendix A (cont'd): Laboratory Review Checklist: Reportable Data									
Laboratory Name:		San Antonio Testing Laboratory Inc.		LRC Date:		12/30/99 to 05/03/23			
Project Name:		Calaveras Power Station-CCR Units Evaporation		Laboratory Job Number:		2304292			
Reviewer Name:		JA,SG,XE		Prep Batch Number(s):		B317141,B317252,B317261,B317276,B317278			
# ¹	A ²	Description	Yes	No	NA ³	NR ⁴	ER# ⁵		
R1		Chain-of-custody (C-O-C)							
		Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?	X						
		Were all departures from standard conditions described in an exception report?	X						
R2		Sample and quality control (QC) identification							
		Are all field sample ID numbers cross-referenced to the laboratory ID numbers?	X						
		Are all laboratory ID numbers cross-referenced to the corresponding QC data?	X						
R3		Test reports							
		Were all samples prepared and analyzed within holding times?	X						
		Other than those results < MQL, were all other raw values bracketed by calibration standards?	X						
		Were calculations checked by a peer or supervisor?	X						
		Were all analyte identifications checked by a peer or supervisor?	X						
		Were sample quantitation limits reported for all analytes not detected?	X						
		Were all results for soil and sediment samples reported on a dry weight basis?				X			
		Were % moisture (or solids) reported for all soil and sediment samples?				X			
		If required for the project, TICs reported?				X			
R4		Surrogate recovery data							
		Were surrogates added prior to extraction?				X			
		Were surrogate percent recoveries in all samples within the laboratory QC limits?				X			
R5		Test reports/summary forms for blank samples							
		Were appropriate type(s) of blanks analyzed?	X						
		Were blanks analyzed at the appropriate frequency?	X						
		Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X						
		Were blank concentrations < MQL?	X						
R6		Laboratory control samples (LCS):							
		Were all COCs included in the LCS?				X			
		Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X						
		Were LCSs analyzed at the required frequency?	X						
		Were LCS (and LCSD, if applicable) %Rs within the laboratory QC limits?	X					S001	
		Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SQLs?	X						
		Was the LCSD RPD within QC limits?	X						
R7		Matrix spike (MS) and matrix spike duplicate (MSD) data							
		Were the project/method specified analytes included in the MS and MSD?	X						
		Were MS/MSD analyzed at the appropriate frequency?	X						
		Were MS (and MSD, if applicable) %Rs within the laboratory QC limits?				X		S002	
		Were MS/MSD RPDs within laboratory QC limits?				X		S003	
R8		Analytical duplicate data							
		Were appropriate analytical duplicates analyzed for each matrix?	X						
		Were analytical duplicates analyzed at the appropriate frequency?	X						
		Were RPDs or relative standard deviations within the laboratory QC limits?	X						
R9		Method quantitation limits (MQLs):							
		Are the MQLs for each method analyte included in the laboratory data package?	X						
		Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X						
		Are unadjusted MQLs included in the laboratory data package?	X						
R10		Other problems/anomalies							
		Are all known problems/anomalies/special conditions noted in this LRC and ER?	X						
		Were all necessary corrective actions performed for the reported data?	X						
		Was applicable and available technology used to lower the SQL minimize the matrix interference affects on the sample results?	X						

1. Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.

2. O = organic analyses; I = inorganic analyses (and general chemistry, when applicable);

3. NA = Not applicable;

4. NR = Not reviewed;

5. ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

RG-366/TRRP-13 December 2002

Appendix A (cont'd): Laboratory Review Checklist: Reportable Data									
Laboratory Name:		San Antonio Testing Laboratory Inc.		LRC Date:		12/30/99 to 05/03/23			
Project Name:		Calaveras Power Station-CCR Units Evaporation		Laboratory Job Number:		2304292			
Reviewer Name:		JA,SG,XE		Prep Batch Number(s):		B317141,B317252,B317261,B317276,B317278			
# ¹	A ²	Description	Yes	No	NA ³	NR ⁴	ER# ⁵		
S1		Initial calibration (ICAL)							
		Were response factors and/or relative response factors for each analyte within QC limits?	X						
		Were percent RSDs or correlation coefficient criteria met?	X						
		Was the number of standards recommended in the method used for all analytes?	X						
		Were all points generated between the lowest and highest standard used to calculate the curve?	X						
		Are ICAL data available for all instruments used?	X						
		Has the initial calibration curve been verified using an appropriate second source standard?	X						
S2		Initial and continuing calibration verification (ICCV and CCV) and continuing calibration							
		Was the CCV analyzed at the method-required frequency?	X						
		Were percent differences for each analyte within the method-required QC limits?	X						
		Was the ICAL curve verified for each analyte?	X						
		Was the absolute value of the analyte concentration in the inorganic CCB < MDL?							
S3		Mass spectral tuning:							
		Was the appropriate compound for the method used for tuning?			X				
		Were ion abundance data within the method-required QC limits?			X				
S4		Internal standards (IS):							
		Were IS area counts and retention times within the method-required QC limits?							
S5		Raw data (NELAC section 1 appendix A glossary, and section 5.12 or ISO/IEC 17025 section							
		Were the raw data (for example, chromatograms, spectral data) reviewed by an analyst?	X						
		Were data associated with manual integrations flagged on the raw data?	X						
S6		Dual column confirmation							
		Did dual column confirmation results meet the method-required QC?			X				
S7		Tentatively identified compounds (TICs):							
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X				
S8		Interference Check Sample (ICS) results:							
		Were percent recoveries within method QC limits?							
S9		Serial dilutions, post digestion spikes, and method of standard additions							
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?							
S10		Method detection limit (MDL) studies							
		Was a MDL study performed for each reported analyte?	X						
		Is the MDL either adjusted or supported by the analysis of DCSSs?	X						
S11		Proficiency test reports:							
		Was the laboratory's performance acceptable on the applicable proficiency tests or evaluation studies?	X						
S12		Standards documentation							
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X						
S13		Compound/analyte identification procedures							
		Are the procedures for compound/analyte identification documented?	X						
S14		Demonstration of analyst competency (DOC)							
		Was DOC conducted consistent with NELAC Chapter 5C or ISO/IEC 4?	X						
		Is documentation of the analyst's competency up-to-date and on file?	X						
S15		Verification/validation documentation for methods (NELAC Chap 5 or ISO/IEC 17025 Section 5)							
		Are all the methods used to generate the data documented, verified, and validated, where applicable?	X						
S16		Laboratory standard operating procedures (SOPs):							
		Are laboratory SOPs current and on file for each method performed?	X						

1. Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.

2. O = organic analyses; I = inorganic analyses (and general chemistry, when applicable);

3. NA = Not applicable;

4. NR = Not reviewed;

5. ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

RG-366/TRRP-13 December 2002

Appendix A (cont'd): Laboratory Review Checklist: Exception Reports			
Laboratory Name: San Antonio Testing Laboratory Inc.		LRC Date: 12/30/99 to 05/03/23	
Project Name: Calaveras Power Station-CCR Units Evaporation		Laboratory Job Number: 2304292	
Reviewer Name: JA,SG,XE		Prep Batch Number(s): B317141,B317252,B317261,B317276,B317278	
ER#¹	Description		
S001			
S002	Matrix Spike Recoveries outside the QC acceptance criteria, due to matrix interferences, are flagged on the analytical report.		
S003	RPD values above the acceptance limits are flagged on the analytical report.		

1. ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked on the LRC)

RG-366/TRRP-13 December 2002

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

SAMPLE SUMMARY

Total Samples received in this work order: 6

<u>Sample ID</u>	<u>Laboratory ID</u>	<u>Matrix</u>	<u>Sampling Method</u>	<u>Date Sampled</u>	<u>Date Received</u>
JKS-36-20230418-CCR	2304292-01	Non-potable Water	Grab	04/18/23 15:02	04/20/23 10:56
JKS-47-20230419-CCR	2304292-02	Non-potable Water	Grab	04/19/23 12:57	04/20/23 10:56
JKS-61-20230419-CCR	2304292-03	Non-potable Water	Grab	04/19/23 10:00	04/20/23 10:56
JKS-63R-20230418-CCR	2304292-04	Non-potable Water	Grab	04/18/23 15:43	04/20/23 10:56
JKS-64-20230419-CCR	2304292-05	Non-potable Water	Grab	04/19/23 11:45	04/20/23 10:56
EB-001-20230419	2304292-06	Non-potable Water	Grab	04/19/23 13:33	04/20/23 10:56

Notes

All quality control samples and checks are within acceptance limits unless otherwise indicated.
Test results pertain only to those items tested.
All samples were in good condition when received by the laboratory unless otherwise noted.

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

Sample ID #: JKS-36-20230418-CCR

Sampling Method: Grab

Lab Sample ID #: 2304292-01

Sample Matrix: Non-potable Water

Date/Time Collected: 04/18/23 15:02

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B317276</i>											
Total Dissolved Solids *	2020	3.12		2.50	3.12	mg/L	SM2540C	SM2540C	04/24/23	JA	
Anions by Ion Chromatography											
<i>Batch ID > B317261</i>											
Chloride *	341	2.50		0.052	1.30	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Fluoride	1.30	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Sulfate *	950	2.50		0.06	1.40	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Total Metals By ICP											
<i>Batch ID > B317141</i>											
Boron	0.415	0.010		0.0006	0.0006	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	
Calcium *	166	1.00		0.009	0.009	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

Sample ID #: JKS-47-20230419-CCR

Sampling Method: Grab

Lab Sample ID #: 2304292-02

Sample Matrix: Non-potable Water

Date/Time Collected: 04/19/23 12:57

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B317278</i>											
Total Dissolved Solids *	1040	2.50		2.50	2.50	mg/L	SM2540C	SM2540C	04/25/23	JA	
Anions by Ion Chromatography											
<i>Batch ID > B317261</i>											
Chloride *	196	2.50		0.052	1.30	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Fluoride	< 0.018	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Sulfate *	295	2.50		0.06	1.40	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Total Metals By ICP											
<i>Batch ID > B317141</i>											
Boron	0.680	0.010		0.0006	0.0006	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	
Calcium *	77.5	1.00		0.009	0.009	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

Sample ID #: JKS-61-20230419-CCR

Sampling Method: Grab

Lab Sample ID #: 2304292-03

Sample Matrix: Non-potable Water

Date/Time Collected: 04/19/23 10:00

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B317278</i>											
Total Dissolved Solids *	1090	2.50		2.50	2.50	mg/L	SM2540C	SM2540C	04/25/23	JA	
Anions by Ion Chromatography											
<i>Batch ID > B317261</i>											
Chloride *	150	2.50		0.052	1.30	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Fluoride	0.355	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Sulfate *	331	2.50		0.06	1.40	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Total Metals By ICP											
<i>Batch ID > B317141</i>											
Boron	1.06	0.010		0.0006	0.0006	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	
Calcium *	71.2	1.00		0.009	0.009	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

Sample ID #: JKS-63R-20230418-CCR

Sampling Method: Grab

Lab Sample ID #: 2304292-04

Sample Matrix: Non-potable Water

Date/Time Collected: 04/18/23 15:43

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B317276</i>											
Total Dissolved Solids *	9540	12.5		2.50	12.5	mg/L	SM2540C	SM2540C	04/24/23	JA	
Anions by Ion Chromatography											
<i>Batch ID > B317261</i>											
Chloride *	2850	50.0		0.052	26.0	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Fluoride	< 0.018	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Sulfate *	1890	50.0		0.06	28.0	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Total Metals By ICP											
<i>Batch ID > B317141</i>											
Boron	1.11	0.010		0.0006	0.0006	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	
Calcium *	886	10.0		0.009	0.091	mg/L	EPA 6010B	EPA 6010B	04/25/23	XE	

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

Sample ID #: JKS-64-20230419-CCR

Sampling Method: Grab

Lab Sample ID #: 2304292-05

Sample Matrix: Non-potable Water

Date/Time Collected: 04/19/23 11:45

Analyte	Result	MLQ	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B317278</i>											
Total Dissolved Solids *	574	2.50		2.50	2.50	mg/L	SM2540C	SM2540C	04/25/23	JA	
Anions by Ion Chromatography											
<i>Batch ID > B317261</i>											
Chloride *	19.2	1.00		0.052	0.519	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Fluoride	0.107	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Sulfate *	212	1.00		0.06	0.56	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Total Metals By ICP											
<i>Batch ID > B317141</i>											
Boron	0.683	0.010		0.0006	0.0006	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	
Calcium *	21.6	1.00		0.009	0.009	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

Sample ID #: EB-001-20230419

Sampling Method: Grab

Lab Sample ID #: 2304292-06

Sample Matrix: Non-potable Water

Date/Time Collected: 04/19/23 13:33

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B317278</i>											
Total Dissolved Solids *	< 2.50	2.50		2.50	2.50	mg/L	SM2540C	SM2540C	04/25/23	JA	
Anions by Ion Chromatography											
<i>Batch ID > B317261</i>											
Chloride *	< 0.052	0.100		0.052	0.052	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Fluoride	< 0.018	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Sulfate *	< 0.06	0.10		0.06	0.06	mg/L	EPA 300.0	EPA 300.0	04/27/23	SG	
Total Metals By ICP											
<i>Batch ID > B317141</i>											
Boron	0.001	0.010	J	0.0006	0.0006	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	
Calcium *	0.654	1.00	J	0.009	0.009	mg/L	EPA 6010B	EPA 6010B	04/24/23	XE	

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

General Chemistry - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B317276 - SM2540C									
Blank (B317276-BLK1)				Prepared: 04/24/23 15:30 Analyzed: 04/24/23 16:50					
Total Dissolved Solids	<2.50	2.50	mg/L				—		
LCS (B317276-BS1)				Prepared: 04/24/23 15:30 Analyzed: 04/24/23 16:50					
Total Dissolved Solids	108	2.50	mg/L	100		108	80–120		
LCS Dup (B317276-BSD1)				Prepared: 04/24/23 15:30 Analyzed: 04/24/23 16:50					
Total Dissolved Solids	95.0	2.50	mg/L	100		95	80–120	13	20
Duplicate (B317276-DUP1)				Source: 2304293-01		Prepared: 04/24/23 15:30 Analyzed: 04/24/23 16:50			
Total Dissolved Solids	2200	3.57	mg/L		2120		—	4	20
Duplicate (B317276-DUP2)				Source: 2304295-06		Prepared: 04/24/23 15:30 Analyzed: 04/24/23 16:50			
Total Dissolved Solids	4060	8.33	mg/L		3970		—	2	20
Batch B317278 - SM2540C									
Blank (B317278-BLK1)				Prepared: 04/25/23 15:00 Analyzed: 04/25/23 16:45					
Total Dissolved Solids	<2.50	2.50	mg/L				—		
LCS (B317278-BS1)				Prepared: 04/25/23 15:00 Analyzed: 04/25/23 16:45					
Total Dissolved Solids	108	2.50	mg/L	100		108	80–120		
LCS Dup (B317278-BSD1)				Prepared: 04/25/23 15:00 Analyzed: 04/25/23 16:45					
Total Dissolved Solids	95.0	2.50	mg/L	100		95	80–120	13	20
Duplicate (B317278-DUP1)				Source: 2304293-05		Prepared: 04/25/23 15:00 Analyzed: 04/25/23 16:45			
Total Dissolved Solids	2480	3.57	mg/L		2310		—	7	20

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P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

General Chemistry - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
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Batch B317278 - SM2540C

Duplicate (B317278-DUP2)

Source: 2304294-11

Prepared: 04/25/23 15:00 Analyzed: 04/25/23 16:45

Total Dissolved Solids	1440	3.12	mg/L	1400	-	2	20
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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
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Notes:

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Anions by Ion Chromatography - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B317252 - EPA 300.0									
Blank (B317252-BLK1)				Prepared: 04/27/23 16:00 Analyzed: 04/27/23 18:01					
Fluoride	<0.020	0.020	mg/L				-		
LCS (B317252-BS1)				Prepared: 04/27/23 16:00 Analyzed: 04/27/23 18:19					
Fluoride	1.07	0.020	mg/L	1.00		107	90-110		
LCS Dup (B317252-BSD1)				Prepared: 04/27/23 16:00 Analyzed: 04/27/23 18:37					
Fluoride	1.01	0.020	mg/L	1.00		101	90-110	5	20
Duplicate (B317252-DUP1)				Source: 2304293-03		Prepared: 04/27/23 16:00 Analyzed: 04/27/23 21:54			
Fluoride	0.0875	0.020	mg/L		0.0869		-	0.7	20
Matrix Spike (B317252-MS1)				Source: 2304293-03		Prepared: 04/27/23 16:00 Analyzed: 04/27/23 22:12			
Fluoride	0.945	0.020	mg/L	1.00	0.0869	86	80-120		
Matrix Spike Dup (B317252-MSD1)				Source: 2304293-03		Prepared: 04/27/23 16:00 Analyzed: 04/27/23 22:29			
Fluoride	0.945	0.020	mg/L	1.00	0.0869	86	80-120	0.04	20
Batch B317261 - EPA 300.0									
Blank (B317261-BLK1)				Prepared: 04/27/23 16:00 Analyzed: 04/27/23 18:01					
Chloride	<0.100	0.100	mg/L				-		
Sulfate	<0.10	0.10	mg/L				-		
LCS (B317261-BS1)				Prepared: 04/27/23 16:00 Analyzed: 04/27/23 18:19					
Chloride	5.47	0.100	mg/L	5.00		109	90-110		
Sulfate	5.51	0.10	mg/L	5.00		110	90-110		

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Notes:

Report No. 2304292

Anions by Ion Chromatography - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	
Batch B317261 - EPA 300.0										
LCS Dup (B317261-BSD1)				Prepared: 04/27/23 16:00 Analyzed: 04/27/23 18:37						
Chloride	5.48	0.100	mg/L	5.00		110	90-110	0.1	20	
Sulfate	5.51	0.10	mg/L	5.00		110	90-110	0.04	20	L
Duplicate (B317261-DUP1)				Source: 2304293-03		Prepared: 04/27/23 16:00 Analyzed: 04/27/23 23:05				
Chloride	95.8	2.50	mg/L		96.1		-	0.4	20	
Sulfate	598	2.50	mg/L		598		-	0.03	20	
Matrix Spike (B317261-MS1)				Source: 2304293-03		Prepared: 04/27/23 16:00 Analyzed: 04/27/23 22:12				
Chloride	119	0.100	mg/L	5.00	96.1	454	80-120			M
Sulfate	742	0.10	mg/L	5.00	598	NR	80-120			M
Matrix Spike Dup (B317261-MSD1)				Source: 2304293-03		Prepared: 04/27/23 16:00 Analyzed: 04/27/23 22:29				
Chloride	119	0.100	mg/L	5.00	96.1	452	80-120	0.09	20	M
Sulfate	742	0.10	mg/L	5.00	598	NR	80-120	0.02	20	M

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Reported:
05/03/23 17:26
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Notes:

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Total Metals By ICP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B317141 - EPA 6010B									
Blank (B317141-BLK1)				Prepared: 04/24/23 13:00 Analyzed: 04/24/23 17:14					
Boron	<0.010	0.010	mg/L				-		
Calcium	<1.00	1.00	mg/L				-		
LCS (B317141-BS1)				Prepared: 04/24/23 13:00 Analyzed: 04/24/23 17:25					
Boron	1.90	0.010	mg/L	2.00		95	85-115		
Calcium	1.87	1.00	mg/L	2.00		94	85-115		
LCS Dup (B317141-BSD1)				Prepared: 04/24/23 13:00 Analyzed: 04/24/23 17:31					
Boron	1.88	0.010	mg/L	2.00		94	85-115	0.9	20
Calcium	1.86	1.00	mg/L	2.00		93	85-115	0.5	20
Duplicate (B317141-DUP1)				Source: 2304292-01		Prepared: 04/24/23 13:00 Analyzed: 04/24/23 17:53			
Boron	0.392	0.010	mg/L		0.415		-	6	20
Calcium	160	1.00	mg/L		166		-	4	20
Duplicate (B317141-DUP2)				Source: 2304293-05		Prepared: 04/24/23 13:00 Analyzed: 04/24/23 19:40			
Boron	0.561	0.010	mg/L		0.579		-	3	20
Calcium	352	1.00	mg/L		358		-	2	20
Matrix Spike (B317141-MS1)				Source: 2304292-01		Prepared: 04/24/23 13:00 Analyzed: 04/24/23 17:59			
Boron	1.72	0.010	mg/L	2.00	0.415	65	75-125		M
Calcium	159	1.00	mg/L	2.00	166	NR	75-125		M
Matrix Spike (B317141-MS2)				Source: 2304293-05		Prepared: 04/24/23 13:00 Analyzed: 04/24/23 19:46			
Boron	2.62	0.010	mg/L	2.00	0.579	102	75-125		
Calcium	352	1.00	mg/L	2.00	358	NR	75-125		M
Matrix Spike Dup (B317141-MSD1)				Source: 2304292-01		Prepared: 04/24/23 13:00 Analyzed: 04/24/23 18:05			
Boron	1.69	0.010	mg/L	2.00	0.415	64	75-125	2	20
Calcium	163	1.00	mg/L	2.00	166	NR	75-125	3	20

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
05/03/23 17:26
Received:
04/20/23 10:56

Notes:

Report No. 2304292

Total Metals By ICP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B317141 - EPA 6010B									
Matrix Spike Dup (B317141-MSD2)		Source: 2304293-05		Prepared: 04/24/23 13:00 Analyzed: 04/24/23 19:52					
Boron	2.62	0.010	mg/L	2.00	0.579	102	75-125	0.08	20
Calcium	336	1.00	mg/L	2.00	358	NR	75-125	5	20

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Pond
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DEFINITIONS

*	TNI / NELAC accredited analyte
PQL	Practical Quantitation Limit
MCL	Maximum Contaminant Level
mg/Kg	Milligrams per Kilogram (Parts per Million)
mg/L	Milligrams per Liter (Parts per Million)
PPM	Parts per Million
ND	This qualifier indicates that the analyte was analyzed but not detected above the MDL
J	This qualifier indicates that the analyte is an estimate value between MQL and MDL
SQL	Sample Quantitation Limit
MQL	Method Quantitation Limit
MDL	Method Detection Limit
L	LCS/LCSD recovery is outside QC limits, the results may have a slight bias.
M	MS/MSD recovery is outside QC limits due to possible matrix interferences, results may have a slight bias .
S	RPD is outside QC limits.
RMCCCL	Recommended Maximum Concentration of Contaminants Level
μR/hr	MicroRoentgens per hour (Measure of Radioactivity Level)
HT	Sample received past holdtime
IC	Improper Container for this analyte(s)
IT	Improper Temperature
IP	Improper preservation for this analyte(s)
V	Insufficient Volume
B	Sample collected in Bulk
AB	VOA Vial contained air bubbles.
OP	ortho-Phosphate was not filtered in the field within 15minutes of collection.
CCV	Continuing Calibration Verification Standard.
ICV	Initial Calibration Verification Standard.
Surr L	Surrogate recovery is low outside QC limits.
Surr H	Surrogate recovery is high outside QC limits.
NR	Not Recovered due to source sample concentration exceeds spiked concentration.

Test Methods followed by the laboratory are referenced in the following approved methodology, unless otherwise specified.

Standard Methods for the Examination of Water and Wastewater, 23rd Edition, 2017
Methods for Chemical Analysis of Water and Wastes, EPA 600/4-79-020, Rev. March 1983
EPA SW Test Methods for the Examination of Solid Waste, SW-846, 1996

CPS Energy - Environmental Dept.
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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

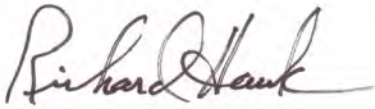
Reported:
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04/20/23 10:56

Notes:

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Aimee Landon For Marcela Gracia Hawk, President For

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



Richard Hawk, General Manager

TRRP *check*

2304292

Client Information	Project Information	Laboratory Information	COC Information
CPS Energy - Environmental Dept. P.O. Box 1771 San Antonio TX 78296-1771 Phone: (210) 353-4719 Fax: (210) 353-4271	Calaveras Power Station-CCR Units Evaporation Pond Number: [none] Sample count: 6 TAT: 7	San Antonio Testing Laboratory 1610 S. Laredo St San Antonio TX 78207 Phone: 210-229-9920 Fax: 210-229-9921	Shipped via: Hand Delivered

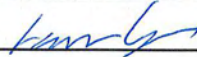
#	Sample Information	Analyses	Containers
#1	JKS-36-20230418-CCR 04/18/2023 15:02 Grab / Liquid	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	1 L Plastic Unpreserved (1) 250 mL Plastic HNO3 (1)
Comments: TRRP REPORTING			
#2	JKS-47-20230419-CCR 04/19/2023 12:57 Grab / Liquid	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	1 L Plastic Unpreserved (1) 250 mL Plastic HNO3 (1)
Comments: TRRP REPORTING			
#3	JKS-61-20230419-CCR 04/19/2023 10:00 Grab / Liquid	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	1 L Plastic Unpreserved (1) 250 mL Plastic HNO3 (1)
Comments: TRRP REPORTING			
#4	JKS-63R-20230418-CCR 04/18/2023 15:43 Grab / Liquid	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	1 L Plastic Unpreserved (1) 250 mL Plastic HNO3 (1)
Comments: TRRP REPORTING			
#5	JKS-64-20230419-CCR 04/19/2023 11:45 Grab / Liquid	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	1 L Plastic Unpreserved (1) 250 mL Plastic HNO3 (1)
Comments: TRRP REPORTING			
#6	EB-001-20230419 04/19/2023 13:33 Grab / Liquid	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	1 L Plastic Unpreserved (1) 250 mL Plastic HNO3 (1)
Comments: TRRP REPORTING			

Relinquished by	Date/Time	Accepted by	Date/Time
Melissa Vargas <i>MV</i>	4-20-23/1015	Lance Simmons <i>LS</i>	4-20-23 1015

TRRP

2304292

TG #7 2.2°C / 2.2°C

LANCE SIMONSON 	11-20-23 10:56	A J L Damer London	APR 20 2023 1056
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Sample Receipt Checklist

Client: CPS Energy - Environmental Dept. Project: Calaveras Power Station-CCR Units Evapora	Project Manager: Marcela Gracia Hawk Project Number: [none]
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Report To:

Chelsey Vasbinder

SATL Report Number: 2304292

Work Order Due by:	05/04/23 17:00 (10 day TAT)	
Received By:	Aimee Landon	Date Received: 04/20/23 10:56
Logged In By:	Aimee Landon	Date Logged In: 04/20/23 11:32

Sample(s) Received on ICE/evidence of Ice (cooler with melted ice,etc):	Yes
Sample temperature at receipt *:	2.2°C
Custody Seals Present:	No
All containers intact:	Yes
Sample labels/COC agree:	Yes
Samples Received within Holding time :	Yes
Samples appropriately preserved **:	Yes
Containers received broken/damaged/leaking:	No
Air bubbles present in VOA vials for VOC/TPH analyses, if applicable:	Not Applicable
TRRP 13 Reporting requested?	Yes
BacT Sample bottles filled to volume (100mL mark), if applicable:	Not Applicable
LCR Sample bottles filled to volume (1 Liter mark), if applicable:	Not Applicable
Subcontracting required for any analyses:	No
RUSH turnaround time requested:	Yes
Requested Turnaround Time:	10 Business days
Samples delivered via :	Hand Delivered
Air bill included if Samples were shipped:	No
Other deviations not meeting SATL sample acceptance criteria notated on CoC:	None

Notes:

* Samples delivered to the laboratory on the same day that they are collected may not meet thermal preservation criteria (>0°C but <6°C) but are acceptable, if they arrive on ice.

** If improperly preserved, notate client authorization on CoC to proceed with analysis.

 Checked By : Aimee Landon

 Date : 04/20/23 10:56

 SATL#FO001
 Revised 09/15/2022

Data Usability Summary
Sampling Event/October 2023

CPS Energy Calaveras Power Station
Coal Combustion Residuals (CCR) Units
San Antonio, Texas

This data usability summary (DUS) was prepared in general accordance with the following key documents:

- 1) *Groundwater Sampling and Analysis Program*, CPS Energy, Calaveras Power Station (ERM, August 2023);
- 2) Texas Commission on Environmental Quality's (TCEQ's) *Review and Reporting of COC Concentration Data Under TRRP* (RG-366/TRRP-13, May 2010); and
- 3) Environmental Protection Agency's (EPA's) *National Functional Guidelines for Inorganic Superfund Methods Data Review* (EPA-540-R-2017-001, January 2017).

Environmental Resources Management (ERM) reviewed four laboratory analytical data packages (2310293, 2310294, 2310304, 2310305) from San Antonio Testing Laboratory (SATL) of San Antonio, Texas for the analysis of ground water samples collected on 17 October to 18 October 2023 at the CPS Energy Calaveras Power Station in San Antonio, Texas. Analytes Radium-226, Radium-228, and Lithium were subbed to Eurofins of St. Louis by SATL for analysis. Data were reviewed to assess conformance with the requirements of the above-referenced documents.

SATL and Eurofins are NELAC-accredited under the Texas Laboratory Accreditation Program for the matrices, analytes, and methods of analysis requested on the chain-of-custody documentation. SATL and Eurofins National Environmental Laboratory Accreditation Program (NELAP) certificates applicable to the period during which the laboratories generated the data in these reports is referenced in the laboratory reports.

Intended Use of Data: To provide concentration data on Appendix III Coal Combustion Residuals (CCR) Rule parameters in ground water at the CPS Energy Calaveras Facility.

Analyses requested for the laboratory packages include the following:

- EPA 300.0 – Inorganic Anions (Chloride, Fluoride, Sulfate) by Ion Chromatography (IC)
- EPA 6010B – Total Metals by Inductively Coupled Plasma-Atomic Emission Spectroscopy (ICP-AES)
- EPA 903.0 and 904.0 – Radium-226 and Radium-228 by Gas Flow Proportional Counters (GFPC)
- SW846 6010D – Total Metals (Lithium) by ICP
- EPA 7470A – Mercury by Cold-Vapor Atomic Absorption (CVAA)
- SM2540C – Total Dissolved Solids

Data were reviewed and validated as described in the above-referenced documents, and the results of the review/validation are discussed in this Data Usability Summary (DUS). The following laboratory submittals and field data were examined:

- The reportable data;
- The laboratory review checklist (LRC) and associated exception report (ER); and
- The Quality Assurance/Quality Control (QA/QC) data supplied by the laboratory.

The results of supporting QC analyses are summarized on the LRC and ER, which are included in this review. The LRC, associated ER, QA/QC data, and reportable data covered by this review are included in the laboratory reports.

The Laboratory Data Package Cover Pages and Laboratory Review Checklists provided in the analytical data packages are outdated and inconsistent with current TRRP-13 guidance (May 2010). It is highly recommended that required items in the current TRRP-13 guidance be followed for laboratory data packages generated to satisfy corrective action program requirements. Data were not qualified based on this deficiency.

Introduction

Twenty-six (26) groundwater samples, two (2) duplicate samples, two (2) field blanks, and one (1) equipment blank were analyzed for select metals and anions. Seven (7) groundwater samples, one (1) duplicate sample, and one (1) field blank was also analyzed for Radium and Lithium. Table 1 lists the sample identifications cross-referenced to laboratory identifications.

Project Data Quality Objectives (DQO)

The quantitative project DQO limits specified in the *Groundwater Sampling and Analysis Program* were utilized as follows:

- Recovery (%R)
 - Spike samples 75-125%
 - Non-spike samples 70-130%
- Relative Percent Difference (RPD) <20%

Data were qualified in accordance with the TCEQ's TRRP-13 guidance document, including data qualifier codes and data qualifier code definitions.

Data Review / Validation Results

Analytical Results

Ground water analytical results were reported in milligrams per liter (mg/L) for metals and anions. Analytical results from Eurofins was reported in micrograms per liter (µg/L) for metals and in picocuries per liter (pCi/L) for radiological analysis. Non-detect results are reported as less than the value of the sample detection limits (SDLs). The method quantitation limits (MQLs) are also reported.

Preservation and Holding Times

The samples were evaluated for agreement with the chain-of-custody forms. The samples were received in the appropriate containers and in good condition with the paperwork properly completed.

Sample receipt temperature of the cooler at SATL were within or less than the acceptance criteria of 4 +/- 2 degrees Celsius. Sample receipt temperature for lab reports 2310293, 2310294, 2310304, 2310305 were 4.1°C, 3.9°C, 4°C, and 3.4°C, respectively. No qualifiers were added to the data. Samples were prepared and analyzed within holding times as specified by the methods. The samples were preserved in the field as specified by the methods, with the following exceptions.

In lab report 2310304, sample FB-002-20231018, and in lab report 2310305, samples JKS-36-20231017-CCR, JKS-61-20231017-CCR, and JKS-72-20231017-CCR were analyzed one day outside of holding time for TDS. The results were qualified as JL, estimated with low bias, for detected results or non-detect and estimated with low bias, UJL, for non-detect results.

For radium analysis, the reference method required samples to be preserved to a pH of <2. If samples are collected without preservation, they must be received by the laboratory within 5 days for preservation according to Method 904 specifications. One sample, JKS-72-20231017-CCR, in lab report 2310305 was received by the laboratory unpreserved 6 days after the sample was collected. The sample was preserved to the appropriate pH in the laboratory; however, the analytical results were still qualified as JL, estimated low, for detected results for radium.

Calibrations

According to the LRC, initial calibrations, continuing calibrations, and calibration verifications data met method requirements for metals and anions, as applicable.

Mass Spectral Tuning

As documented in the LRC, mass spectrometry instrument performance tunes were either not applicable (appropriate compound for the method) or met specific requirements for the requested analytical methods (ion abundance data within limits).

Internal Standards

As documented in the LRC, internal standard area counts and retention times were within or not applicable for the requested analytical methods.

Percent Yield

Ba and Y Carrier percent yields for radium analysis were within laboratory acceptance limits.

Blanks

Metals, radium, and anions were not detected in the method blanks, field blanks, or equipment blanks, with the following exceptions.

For laboratory report 2310294, boron (0.004J) and calcium (0.076J) were detected in the field blank. For laboratory report 2310304, boron (0.003J), calcium (0.057J), and chloride (0.052J) were detected in the field blank. For laboratory report 2310295, boron (0.007J) and calcium (0.122J) were detected in the equipment blank. However, detected results for calcium, boron, and chloride were greater than five times the field or equipment blank concentrations; as such, no qualifiers were required.

Laboratory Control Samples

Laboratory control sample and duplicate (LCS/LCSD) precision and accuracy results (*i.e.*, percent recoveries and RPDs) for all analyses were within project DQO acceptance limits, with the following exception.

In lab reports 2310294, 2310304, and 2310305, LCS/LCSD percent recoveries for mercury were above laboratory limits, but within DQO limits; therefore, no qualifiers were required.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicate (MS/MSD) precision and accuracy results (*i.e.*, percent recoveries and RPDs) using project samples were within project DQO acceptance limits, with the following exceptions.

In lab report 2310293, MS/MSD analysis was performed on project samples JKS-46-20231017-CCR for anions and JKS-31-20231018-CCR and JKS-51-20231018-CCR for metals. The MS and MSD had recoveries above laboratory and DQO limits or Not Recoverable (NR) for chloride and sulfate. The parent concentrations for chloride and sulfate were greater than four times the amount spiked into it; therefore, no qualifiers were required for high MS/MSD recoveries for chloride or the NR-flagged recoveries for sulfate. The MS and MSD recoveries for metals were run on two project-related samples in the same batch. The MS/MSD recoveries for boron and calcium were above laboratory and DQO limits or Not Recoverable (NR) for calcium. The parent concentration for calcium was greater than four times the amount spiked into it; therefore, no qualifiers were required for calcium. Additionally, MS/MSD recoveries for boron were within DQO limits associated with sample JKS-51-20231018-CCR in the same batch. As such, only the parent sample would be qualified as estimated with high bias (JH) due to high MS/MSD recoveries.

In lab report 2310294, MS/MSD analysis was performed on project samples JKS-46-20231017-CCR and FB-001-20231018 for anions and JKS-31-20231018-CCR and JKS-51-20231018-CCR for metals. The MS and MSD had recoveries above laboratory and DQO limits or Not Recoverable (NR) for chloride and sulfate. The parent concentrations for chloride and sulfate were greater than four times the amount spiked into it; therefore, no qualifiers were required for high MS/MSD recoveries for chloride or the NR-flagged recoveries for sulfate. The MS and MSD had recoveries above laboratory and DQO limits for cadmium, calcium, selenium, arsenic, and boron; however, MS/MSD recoveries for arsenic and boron were within DQO limits associated with sample JKS-31-20231018-CCR in the same batch. As such, only the parent sample JKS-51-20231018-CCR was qualified as estimated with high bias (JH) for arsenic and boron (if analyzed) due to high MS/MSD recoveries. All samples in the batch with reported detections for cadmium and selenium were qualified as estimated with high bias (JH) due to high MS/MSD recoveries. The MS/MSD recoveries were Not Recoverable (NR) for Calcium as the parent concentrations were greater than four times the amount spiked into it; therefore, no qualifiers were required for calcium.

In lab report 2310304, MS/MSD analysis was performed on project sample JKS-65-20231018-PDP for anions. The MS and MSD had recoveries above laboratory and DQO limits or Not Recoverable (NR) and MSD RPDs higher than DQO limits for chloride and sulfate. The parent concentrations for chloride and sulfate were greater than four times the amount spiked into it; therefore, no qualifiers were required for high MS/MSD recoveries or RPDs for sulfate or the NR-flagged recoveries for chloride.

In lab report 2310305, MS/MSD analysis was performed on project sample JKS-47-20231018-CCR for anions. The MS and MSD had Not Recoverable (NR) recoveries for chloride and sulfate. The parent concentrations for chloride and sulfate were greater than four times the amount spiked into it; therefore, no qualifiers were required for the NR-flagged recoveries.

In lab report 2310305, MS/MSD analysis was performed on project sample 2310305-01 for metals. MS/MSD recoveries were below DQO limits for antimony, barium, beryllium, boron, chromium, and cobalt and were above DQO limits or Not Recoverable (NR) for cadmium and calcium. The parent concentration for calcium was greater than four times the amount spiked into it; therefore, no qualifiers were required for calcium. All samples in the batch with reported concentrations for antimony, barium, beryllium, boron, chromium, and cobalt were qualified as estimated with low bias (JL) or non-detect and estimated with low bias (UJL) due to low MS/MSD recoveries. All samples in the batch with reported detections for cadmium were qualified as estimated with high bias (JH) for cadmium (if analyzed) due to high MS/MSD recoveries.

Post Digestion Spike

According to the LRC, post digestion spike (PDS) recoveries were within method acceptance limits.

Serial Dilution

According to the LRC, serial dilution (SD) percent differences (%D) were within method acceptance limits.

Laboratory Precision

Laboratory duplicate RPD using project samples were within project DQO acceptance limits, with the following exceptions.

In lab report 2310293, the laboratory duplicate RPDs for boron and calcium, performed on project samples JKS-31-20231018-CCR and JKS-51-20231018-CCR, were higher than DQO limits only for sample JKS-51-20231018-CCR. Since both laboratory duplicates were run on the same batch, only the parent sample, JKS-51-20231018-CCR, was qualified as estimated (J) for boron and calcium due to high laboratory precision RPD.

In lab report 2310294, the laboratory duplicate RPDs for arsenic, barium, boron, calcium, and molybdenum, performed on project samples JKS-31-20231018-CCR and JKS-51-20231018-CCR, were higher than DQO limits; however, only arsenic RPDs were above DQO limits for both parent samples. Affected samples in the batch had detected results less than the MQL; as such, no qualifiers were required for arsenic. Since both laboratory duplicates were run on the same batch, only the parent sample, JKS-31-20231018-CCR or JKS-51-20231018-CCR would need to be qualified for molybdenum, boron, barium, calcium, and/or lead. However, only boron and calcium were analyzed in parent sample JKS-51-20231018-CCR; as such, only boron and calcium were qualified.

In lab report 2310305, the laboratory duplicate RPD for sulfate, performed on project sample JKS-47-20231018-CCR, was higher than DQO limits. Affected samples in the batch detected at concentrations above the MQL for sulfate were qualified as estimated, J, for high laboratory precision RPD.

Field Precision

Two pairs of field precision samples were collected during the November 2023 event (JKS-56-20231017-CCR / DUP-001-20231017 and JKS-65-20231018-PDP / DUP-002-20231018). RPD calculations for detected analytes for each field precision pair are shown in Table 2. All RPD were within DQO limits or had sample concentrations less than two times the value of the MQL; as such, no qualifiers were required.

Field Procedures

Sample collection procedures were in accordance with EPA ground water sampling protocols and the *Ground Water Sampling and Analysis Program*, dated August 2023.

SUMMARY

Ground water analytical results are useable for the purpose of provide concentration data on Appendix III Coal Combustion Residuals (CCR) Rule parameters in ground water at the CPS Energy Calaveras Power Station. Table 2 lists qualified data.

Tables

TABLE 1
Sample Cross-Reference

CPS Energy
Calaveras Power Station

Lab Report	Lab Identification	Field Identification	Sample Date	Sample Type
2310293	2310293-01	JKS-31-20231018-CCR	10/18/2023	Groundwater
2310293	2310293-02	JKS-33-20231017-CCR	10/17/2023	Groundwater
2310293	2310293-03	JKS-45-20231017-CCR	10/17/2023	Groundwater
2310293	2310293-04	JKS-46-20231017-CCR	10/17/2023	Groundwater
2310293	2310293-05	JKS-60-20231017-CCR	10/17/2023	Groundwater
2310294	2310294-01	JKS-48-20231017-CCR	10/17/2023	Groundwater
2310294	2310294-02	JKS-49-20231017-CCR	10/17/2023	Groundwater
2310294	2310294-03	JKS-50R-20231017-CCR	10/17/2023	Groundwater
2310294	2310294-04	JKS-51-20231018-CCR	10/28/2023	Groundwater
2310294	2310294-05	JKS-52-20231017-CCR	10/17/2023	Groundwater
2310294	2310294-06	JKS-53-20231017-CCR	10/17/2023	Groundwater
2310294	2310294-07	JKS-54-20231017-CCR	10/17/2023	Groundwater
2310294	2310294-08	JKS-56-20231017-CCR	10/17/2023	Groundwater
2310294	2310294-09	JKS-70-20231018-CCR	10/18/2023	Groundwater
2310294	2310294-10	FB-001-20231018	10/18/2023	Field Blank
2310294	2310294-11	DUP-001-20231017	10/17/2023	Duplicate Sample
2310294	2310294-12	JKS-55-20231017-CCR	10/17/2023	Groundwater
2310304	2310304-01	JKS-65-20231018-PDP	10/18/2023	Groundwater
2310304	2310304-02	JKS-66-20231018-PDP	10/18/2023	Groundwater
2310304	2310304-03	JKS-67-20231018-PDP	10/18/2023	Groundwater
2310304	2310304-04	JKS-68-20231018-PDP	10/18/2023	Groundwater
2310304	2310304-05	JKS-69-20231018-PDP	10/18/2023	Groundwater
2310304	2310304-06	DUP-002-20231018	10/18/2023	Duplicate Sample
2310304	2310304-07	FB-002-20231018	10/18/2023	Field Blank
2310305	2310305-01	JKS-36-20231017-CCR	10/17/2023	Groundwater
2310305	2310305-02	JKS-47-20231018-CCR	10/17/2023	Groundwater
2310305	2310305-03	JKS-61-20231017-CCR	10/18/2023	Groundwater
2310305	2310305-04	JKS-63R-20231018-CCR	10/17/2023	Groundwater
2310305	2310305-05	JKS-64-20231018-CCR	10/18/2023	Groundwater
2310305	2310305-06	JKS-72-20231017-CCR	10/17/2023	Groundwater
2310305	2310305-07	EB-001-20231018-CCR	10/18/2023	Equipment Blank

TABLE 2
Data Usability Qualifiers

CPS Energy
Calaveras Power Station

Lab Report	Field ID	Parameter	Qualification	Rationale
2310304	FB-002-20231018	TDS	UJL	Outside Analysis Holding Time
2310305	JKS-36-20231017-CCR	TDS	JL	Outside Analysis Holding Time
2310305	JKS-61-20231017-CCR	TDS	JL	Outside Analysis Holding Time
2310305	JKS-72-20231017-CCR	TDS	JL	Outside Analysis Holding Time
2310305	JKS-72-20231017-CCR	Radium-226	JL	Outside Preservation Holding Time
2310305	JKS-72-20231017-CCR	Radium-228	JL	Outside Preservation Holding Time
2310305	JKS-72-20231017-CCR	Combined Radium	JL	Outside Preservation Holding Time
2310294	JKS-51-20231018-CCR	Boron	JH	High MS/MSD Recovery and High Laboratory Precision RPD
2310294	JKS-51-20231018-CCR	Calcium	J	High Laboratory Precision RPD
2310294	JKS-70-20231018-CCR	Cadmium	JH	High MS/MSD Recovery
2310294	JKS-70-20231018-CCR	Selenium	JH	High MS/MSD Recovery
2310305	JKS-36-20231017-CCR	Sulfate	J	High Laboratory Precision RPD
2310305	JKS-47-20231018-CCR	Sulfate	J	High Laboratory Precision RPD
2310305	JKS-61-20231017-CCR	Sulfate	J	High Laboratory Precision RPD
2310305	JKS-63R-20231018-CCR	Sulfate	J	High Laboratory Precision RPD
2310305	JKS-64-20231018-CCR	Sulfate	J	High Laboratory Precision RPD
2310305	JKS-72-20231017-CCR	Sulfate	J	High Laboratory Precision RPD
2310305	JKS-36-20231017-CCR	Boron	JL	Low MS/MSD Recovery
2310305	JKS-47-20231018-CCR	Boron	JL	Low MS/MSD Recovery
2310305	JKS-61-20231017-CCR	Boron	JL	Low MS/MSD Recovery
2310305	JKS-63R-20231018-CCR	Boron	JL	Low MS/MSD Recovery
2310305	JKS-64-20231018-CCR	Boron	JL	Low MS/MSD Recovery
2310305	JKS-72-20231017-CCR	Boron	JL	Low MS/MSD Recovery
2310305	EB-001-20231018-CCR	Boron	JL	Low MS/MSD Recovery
2310305	JKS-72-20231017-CCR	Antimony	UJL	Low MS/MSD Recovery
2310305	JKS-72-20231017-CCR	Barium	JL	Low MS/MSD Recovery
2310305	JKS-72-20231017-CCR	Beryllium	JL	Low MS/MSD Recovery
2310305	JKS-72-20231017-CCR	Chromium	JL	Low MS/MSD Recovery
2310305	JKS-72-20231017-CCR	Cobalt	JL	Low MS/MSD Recovery
2310305	JKS-72-20231017-CCR	Cadmium	JH	High MS/MSD Recovery

Notes:

J = Estimated

UJ = Non-detect Estimated

TABLE 3
Field Precision

CPS Energy
Calaveras Power Station

Lab Report	Field Duplicate Pair	Parameter	Sample Result	Duplicate Result	RPD	Qualifier
2310294	JKS-56-20231017-CCR / DUP-001-20231017	TDS	840	780	7.41	A
		Chloride	133	131	1.52	A
		Fluoride	0.448	0.451	0.67	A
		Sulfate	0.62 J	0.62 J	0.00	A
		Boron	3.35	3.39	1.19	A
		Calcium	106	102	3.85	A
2310304	JKS-65-20231018-PDP / DUP-002-20231018	TDS	524	511	2.51	A
		Chloride	114	104	9.17	A
		Fluoride	0.600	0.605	0.83	A
		Sulfate	62.2	56.1	10.31	A
		Arsenic	0.002 J	0.0006 J	107.69	A*
		Boron	0.273	0.284	3.95	A
		Barium	0.027	0.027	0.00	A
		Calcium	21.3	21.6	1.40	A
		Cadmium	0.0003 U	0.0004 J	28.57	A*
		Chromium	0.002 J	0.002 J	0.00	A
		Lead	0.002 J	0.006 J	100.00	A*
		Selenium	0.007 J	0.013	60.00	A*

Notes:

RPD - Relative Percent Difference

$RPD = (Sample\ Result - Duplicate\ Result) \times 200 / (Sample\ Result + Duplicate\ Result)$

Qualifier: A = Acceptable (no qualification necessary)

A* = Acceptable data based on sample concentrations less than two times the MQL

J = Estimated

November 22, 2023

Chelsey Vasbinder

CPS Energy - Environmental Dept.

P.O. Box 1771

San Antonio, TX 78296-1771

SATL Report No.: 2310305

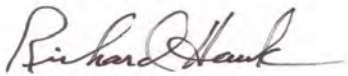
RE: Calaveras Power Station-CCR Units Evaporation Pond

Dear Chelsey Vasbinder

SATL received 7 Sample(s) on 10/19/2023 for analyses identified on the chain of custody. The analyses were performed using methods indicated on the laboratory report. Any deviations observed at sample receiving are notated on the Sample Receipt Checklist and/or Chain of Custody documents attached as part of this analytical report.

Sincerely,

For San Antonio Testing Laboratory, Inc.



Richard Hawk,
General Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

Appendix A Laboratory Data Package Cover Page

This data package consists of:

- ☒ This signature page, the laboratory review checklist, and the following reportable data:
- ☒ R1 Field chain-of-custody documentation;
- ☒ R2 Sample identification cross-reference;
- ☒ R3 Test reports (analytical data sheets) for each environmental sample that includes:
 - a) Items consistent with NELAC 5.13 or ISO/IEC 17025 Section 5.10
 - b) dilution factors,
 - c) preparation methods,
 - d) cleanup methods, and
 - e) if required for the project, tentatively identified compounds (TICs).
- ☒ R4 Surrogate recovery data including:
 - a) Calculated recovery (%R), and
 - b) The laboratory's surrogate QC limits.
- ☒ R5 Test reports/summary forms for blank samples;
- ☒ R6 Test reports/summary forms for laboratory control samples (LCSs) including:
 - a) LCS spiking amounts,
 - b) Calculated %R for each analyte, and
 - c) The laboratory's LCS QC limits.
- ☒ R7 Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
 - a) Samples associated with the MS/MSD clearly identified,
 - b) MS/MSD spiking amounts,
 - c) Concentration of each MS/MSD analyte measured in the parent and spiked samples,
 - d) Calculated %Rs and relative percent differences (RPDs), and
 - e) The laboratory's MS/MSD QC limits
- ☒ R8 Laboratory analytical duplicate (if applicable) recovery and precision:
 - a) the amount of analyte measured in the duplicate,
 - b) the calculated RPD, and
 - c) the laboratory's QC limits for analytical duplicates.
- ☒ R9 List of method quantitation limits (MQLs) for each analyte for each method and matrix;
- ☒ R10 Other problems or anomalies.
- ☒ The Exception Report for every "No" or "Not Reviewed (NR)" item in laboratory review checklist.

Release Statement: I am responsible for the release of this laboratory data package. This data package has been reviewed by the laboratory and is complete and technically compliant with the requirements of the methods used, except where noted by the laboratory in the attached exception reports. By my signature below, I affirm to the best of my knowledge, all problems/anomalies, observed by the laboratory as having the potential to affect the quality of the data, have been identified by the laboratory in the Laboratory Review Checklist, and no information or data have been knowingly withheld that would affect the quality of the data.

Aimee Landon For Marcela Gracia Hawk, President



Richard Hawk, General Manager

11/22/23 16:30

Date/Time

Project Name: Calaveras Power Station-CCR Units Evaporation Pond
Laboratory Job Number: 2310305

Reviewer Name: AO,SA,SJ
Matrix :

RG-366/TRRP-13 December 2002

1610 S. Laredo Street, San Antonio, Texas 78207-7029 (210) 229-9920 Fax (210) 229-9921

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Appendix A (cont'd): Laboratory Review Checklist: Reportable Data									
Laboratory Name:		San Antonio Testing Laboratory Inc.		LRC Date:		12/30/99 to 11/01/23			
Project Name:		Calaveras Power Station-CCR Units Evaporation		Laboratory Job Number:		2310305			
Reviewer Name:		AO,SA,SJ		Prep Batch Number(s):		B343143,B343169,B343194,B344138			
# ¹	A ²	Description	Yes	No	NA ³	NR ⁴	ER# ⁵		
R1		Chain-of-custody (C-O-C)							
		Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?	X						
		Were all departures from standard conditions described in an exception report?	X						
R2		Sample and quality control (QC) identification							
		Are all field sample ID numbers cross-referenced to the laboratory ID numbers?	X						
		Are all laboratory ID numbers cross-referenced to the corresponding QC data?	X						
R3		Test reports							
		Were all samples prepared and analyzed within holding times?		X				S001	
		Other than those results < MQL, were all other raw values bracketed by calibration standards?	X						
		Were calculations checked by a peer or supervisor?	X						
		Were all analyte identifications checked by a peer or supervisor?	X						
		Were sample quantitation limits reported for all analytes not detected?	X						
		Were all results for soil and sediment samples reported on a dry weight basis?			X				
		Were % moisture (or solids) reported for all soil and sediment samples?			X				
		If required for the project, TICs reported?			X				
R4		Surrogate recovery data							
		Were surrogates added prior to extraction?			X				
		Were surrogate percent recoveries in all samples within the laboratory QC limits?			X				
R5		Test reports/summary forms for blank samples							
		Were appropriate type(s) of blanks analyzed?	X						
		Were blanks analyzed at the appropriate frequency?	X						
		Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X						
		Were blank concentrations < MQL?	X						
R6		Laboratory control samples (LCS):							
		Were all COCs included in the LCS?	X						
		Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X						
		Were LCSs analyzed at the required frequency?	X						
		Were LCS (and LCSD, if applicable) %Rs within the laboratory QC limits?		X				S002	
		Does the detectability data document the laboratory's capability to detect the COCs at the MDL used to calculate the SQLs?							
		Was the LCSD RPD within QC limits?	X						
R7		Matrix spike (MS) and matrix spike duplicate (MSD) data							
		Were the project/method specified analytes included in the MS and MSD?	X						
		Were MS/MSD analyzed at the appropriate frequency?	X						
		Were MS (and MSD, if applicable) %Rs within the laboratory QC limits?		X				S003	
		Were MS/MSD RPDs within laboratory QC limits?	X						
R8		Analytical duplicate data							
		Were appropriate analytical duplicates analyzed for each matrix?	X						
		Were analytical duplicates analyzed at the appropriate frequency?	X						
		Were RPDs or relative standard deviations within the laboratory QC limits?		X				S004	
R9		Method quantitation limits (MQLs):							
		Are the MQLs for each method analyte included in the laboratory data package?	X						
		Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X						
		Are unadjusted MQLs included in the laboratory data package?	X						
R10		Other problems/anomalies							
		Are all known problems/anomalies/special conditions noted in this LRC and ER?	X						
		Were all necessary corrective actions performed for the reported data?	X						
		Was applicable and available technology used to lower the SQL minimize the matrix interference affects on the sample results?	X						

1. Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.

2. O = organic analyses; I = inorganic analyses (and general chemistry, when applicable);

3. NA = Not applicable;

4. NR = Not reviewed;

5. ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

RG-366/TRRP-13 December 2002

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Appendix A (cont'd): Laboratory Review Checklist: Reportable Data									
Laboratory Name:		San Antonio Testing Laboratory Inc.		LRC Date:		12/30/99 to 11/01/23			
Project Name:		Calaveras Power Station-CCR Units Evaporation		Laboratory Job Number:		2310305			
Reviewer Name:		AO,SA,SJ		Prep Batch Number(s):		B343143,B343169,B343194,B344138			
# ¹	A ²	Description	Yes	No	NA ³	NR ⁴	ER# ⁵		
S1		Initial calibration (ICAL)							
		Were response factors and/or relative response factors for each analyte within QC limits?	X						
		Were percent RSDs or correlation coefficient criteria met?	X						
		Was the number of standards recommended in the method used for all analytes?	X						
		Were all points generated between the lowest and highest standard used to calculate the curve?	X						
		Are ICAL data available for all instruments used?	X						
		Has the initial calibration curve been verified using an appropriate second source standard?	X						
S2		Initial and continuing calibration verification (ICCV and CCV) and continuing calibration							
		Was the CCV analyzed at the method-required frequency?	X						
		Were percent differences for each analyte within the method-required QC limits?	X						
		Was the ICAL curve verified for each analyte?	X						
		Was the absolute value of the analyte concentration in the inorganic CCB < MDL?	X						
S3		Mass spectral tuning:							
		Was the appropriate compound for the method used for tuning?			X				
		Were ion abundance data within the method-required QC limits?			X				
S4		Internal standards (IS):							
		Were IS area counts and retention times within the method-required QC limits?			X				
S5		Raw data (NELAC section 1 appendix A glossary, and section 5.12 or ISO/IEC 17025 section							
		Were the raw data (for example, chromatograms, spectral data) reviewed by an analyst?	X						
		Were data associated with manual integrations flagged on the raw data?			X				
S6		Dual column confirmation							
		Did dual column confirmation results meet the method-required QC?			X				
S7		Tentatively identified compounds (TICs):							
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X				
S8		Interference Check Sample (ICS) results:							
		Were percent recoveries within method QC limits?	X						
S9		Serial dilutions, post digestion spikes, and method of standard additions							
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?	X						
S10		Method detection limit (MDL) studies							
		Was a MDL study performed for each reported analyte?	X						
		Is the MDL either adjusted or supported by the analysis of DCSs?	X						
S11		Proficiency test reports:							
		Was the laboratory's performance acceptable on the applicable proficiency tests or evaluation studies?	X						
S12		Standards documentation							
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X						
S13		Compound/analyte identification procedures							
		Are the procedures for compound/analyte identification documented?	X						
S14		Demonstration of analyst competency (DOC)							
		Was DOC conducted consistent with NELAC Chapter 5C or ISO/IEC 4?	X						
		Is documentation of the analyst's competency up-to-date and on file?	X						
S15		Verification/validation documentation for methods (NELAC Chap 5 or ISO/IEC 17025 Section 5)							
		Are all the methods used to generate the data documented, verified, and validated, where applicable?	X						
S16		Laboratory standard operating procedures (SOPs):							
		Are laboratory SOPs current and on file for each method performed?	X						

1. Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.

2. O = organic analyses; I = inorganic analyses (and general chemistry, when applicable);

3. NA = Not applicable;

4. NR = Not reviewed;

5. ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

RG-366/TRRP-13 December 2002

Appendix A (cont'd): Laboratory Review Checklist: Exception Reports			
Laboratory Name: San Antonio Testing Laboratory Inc.		LRC Date: 12/30/99 to 11/01/23	
Project Name: Calaveras Power Station-CCR Units Evaporation		Laboratory Job Number: 2310305	
Reviewer Name: AO,SA,SJ		Prep Batch Number(s): B343143,B343169,B343194,B344138	
ER#¹	Description		
S001	TDS analysis on 3 samples past hold by 1 day. Data flagged on the analytical report.		
S002	% Recoveries outside the QC acceptance criteria are flagged on the analytical report.		
S003	Matrix Spike Recoveries outside the QC acceptance criteria, due to matrix interferences, are flagged on the analytical report.		
S004	RPD values above the acceptance limits are flagged on the analytical report.		

1. ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked on the LRC)

RG-366/TRRP-13 December 2002

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

SAMPLE SUMMARY

Total Samples received in this work order: 7

<u>Sample ID</u>	<u>Laboratory ID</u>	<u>Matrix</u>	<u>Sampling Method</u>	<u>Date Sampled</u>	<u>Date Received</u>
JKS-36-20231017-CCR	2310305-01	Non-potable Water	Grab	10/17/23 13:27	10/19/23 10:22
JKS-47-20231018-CCR	2310305-02	Non-potable Water	Grab	10/18/23 09:32	10/19/23 10:22
JKS-61-20231017-CCR	2310305-03	Non-potable Water	Grab	10/17/23 14:27	10/19/23 10:22
JKS-63R-20231018-CCR	2310305-04	Non-potable Water	Grab	10/18/23 10:23	10/19/23 10:22
JKS-64-20231018-CCR	2310305-05	Non-potable Water	Grab	10/18/23 08:53	10/19/23 10:22
JKS-72-20231017-CCR	2310305-06	Non-potable Water	Grab	10/17/23 15:36	10/19/23 10:22
EB-001-20231018-CCR	2310305-07	Non-potable Water	Grab	10/18/23 13:40	10/19/23 10:22

Notes

All quality control samples and checks are within acceptance limits unless otherwise indicated.
Test results pertain only to those items tested.
All samples were in good condition when received by the laboratory unless otherwise noted.

CPS Energy - Environmental Dept.
P.O. Box 1771
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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

Sample ID #: JKS-36-20231017-CCR

Sampling Method: Grab

Lab Sample ID #: 2310305-01

Sample Matrix: Non-potable Water

Date/Time Collected: 10/17/23 13:27

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B343194</i>											
Total Dissolved Solids *	1940	3.57		2.50	3.57	mg/L	SM2540C	SM2540C	10/25/23	SG	A
Anions by Ion Chromatography											
<i>Batch ID > B344138</i>											
Chloride *	< 0.052	0.100		0.052	0.052	mg/L	EPA 300.0	EPA 300.0	10/28/23	SA	
Fluoride	0.517	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	10/28/23	SG	
Sulfate *	838	10.0		0.06	5.59	mg/L	EPA 300.0	EPA 300.0	11/01/23	SA	
Total Metals By ICP											
<i>Batch ID > B343143</i>											
Boron	0.368	0.010		0.0006	0.0006	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Calcium *	168	1.00		0.009	0.009	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

Sample ID #: JKS-47-20231018-CCR

Sampling Method: Grab

Lab Sample ID #: 2310305-02

Sample Matrix: Non-potable Water

Date/Time Collected: 10/18/23 09:32

Analyte	Result	MLQ	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B343194</i>											
Total Dissolved Solids *	899	2.50		2.50	2.50	mg/L	SM2540C	SM2540C	10/25/23	SG	
Anions by Ion Chromatography											
<i>Batch ID > B344138</i>											
Chloride *	168	0.100		0.052	0.052	mg/L	EPA 300.0	EPA 300.0	10/28/23	SA	
Fluoride	0.101	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	10/28/23	SG	
Sulfate *	265	1.00		0.06	0.56	mg/L	EPA 300.0	EPA 300.0	10/30/23	SA	
Total Metals By ICP											
<i>Batch ID > B343143</i>											
Boron	0.761	0.010		0.0006	0.0006	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Calcium *	68.8	1.00		0.009	0.009	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

Sample ID #: JKS-61-20231017-CCR

Sampling Method: Grab

Lab Sample ID #: 2310305-03

Sample Matrix: Non-potable Water

Date/Time Collected: 10/17/23 14:27

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B343194</i>											
Total Dissolved Solids *	993	2.50		2.50	2.50	mg/L	SM2540C	SM2540C	10/25/23	SG	A
Anions by Ion Chromatography											
<i>Batch ID > B344138</i>											
Chloride *	< 0.052	0.100		0.052	0.052	mg/L	EPA 300.0	EPA 300.0	10/28/23	SA	
Fluoride	0.445	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	10/28/23	SG	
Sulfate *	274	2.50		0.06	1.40	mg/L	EPA 300.0	EPA 300.0	10/30/23	SA	
Total Metals By ICP											
<i>Batch ID > B343143</i>											
Boron	1.01	0.010		0.0006	0.0006	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Calcium *	82.4	1.00		0.009	0.009	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

Sample ID #: JKS-63R-20231018-CCR

Sampling Method: Grab

Lab Sample ID #: 2310305-04

Sample Matrix: Non-potable Water

Date/Time Collected: 10/18/23 10:23

Analyte	Result	MLQ	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B343194</i>											
Total Dissolved Solids *	7560	16.7		2.50	16.7	mg/L	SM2540C	SM2540C	10/25/23	SG	
Anions by Ion Chromatography											
<i>Batch ID > B344138</i>											
Chloride *	2730	10.0		0.052	5.19	mg/L	EPA 300.0	EPA 300.0	11/01/23	SA	
Fluoride	0.050	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	10/28/23	SG	
Sulfate *	1920	5.00		0.06	2.80	mg/L	EPA 300.0	EPA 300.0	10/30/23	SA	
Total Metals By ICP											
<i>Batch ID > B343143</i>											
Boron	1.33	0.010		0.0006	0.0006	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Calcium *	949	1.00		0.009	0.009	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

Sample ID #: JKS-64-20231018-CCR

Sampling Method: Grab

Lab Sample ID #: 2310305-05

Sample Matrix: Non-potable Water

Date/Time Collected: 10/18/23 08:53

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B343194</i>											
Total Dissolved Solids *	560	2.50		2.50	2.50	mg/L	SM2540C	SM2540C	10/25/23	SG	
Anions by Ion Chromatography											
<i>Batch ID > B344138</i>											
Chloride *	22.4	0.100		0.052	0.052	mg/L	EPA 300.0	EPA 300.0	10/28/23	SA	
Fluoride	0.110	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	10/28/23	SG	
Sulfate *	205	1.00		0.06	0.56	mg/L	EPA 300.0	EPA 300.0	10/30/23	SA	
Total Metals By ICP											
<i>Batch ID > B343143</i>											
Boron	0.741	0.010		0.0006	0.0006	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Calcium *	23.8	1.00		0.009	0.009	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

Sample ID #: JKS-72-20231017-CCR

Sampling Method: Grab

Lab Sample ID #: 2310305-06

Sample Matrix: Non-potable Water

Date/Time Collected: 10/17/23 15:36

Analyte	Result	MLQ	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B343194</i>											
Total Dissolved Solids *	3150	6.25		2.50	6.25	mg/L	SM2540C	SM2540C	10/25/23	SG	A
Anions by Ion Chromatography											
<i>Batch ID > B344138</i>											
Chloride *	351	10.0		0.052	5.19	mg/L	EPA 300.0	EPA 300.0	10/30/23	SA	
Fluoride	< 0.018	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	10/28/23	SG	
Sulfate *	1710	10.0		0.06	5.59	mg/L	EPA 300.0	EPA 300.0	10/30/23	SA	
Total Mercury											
<i>Batch ID > B343169</i>											
Mercury	< 0.0001	0.0002		0.0001	0.0001	mg/L	EPA 7470A	EPA 7470A	10/24/23	AO	
Total Metals By ICP											
<i>Batch ID > B343143</i>											
Arsenic	0.002	0.010	J	0.0006	0.0006	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Boron	4.44	0.010		0.0006	0.0006	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Barium	0.054	0.010		0.003	0.003	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Beryllium	0.0006	0.004	J	0.0003	0.0003	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Calcium *	388	1.00		0.009	0.009	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Cadmium	0.003	0.005	J	0.0003	0.0003	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Cobalt	0.012	0.010		0.0003	0.0003	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Chromium	0.001	0.010	J	0.0003	0.0003	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Molybdenum	0.006	0.010	J	0.0003	0.0003	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Lead *	0.008	0.010	J	0.0003	0.0003	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Antimony	< 0.002	0.010		0.002	0.002	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Selenium	0.044	0.010		0.002	0.002	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Thallium	< 0.0009	0.010		0.0009	0.0009	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
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Received:
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Notes:

Report No. 2310305

Sample ID #: EB-001-20231018-CCR

Sampling Method: Grab

Lab Sample ID #: 2310305-07

Sample Matrix: Non-potable Water

Date/Time Collected: 10/18/23 13:40

Analyte	Result	ML	Flag	MDL	SQL[SDL]	Units	PrepMethod	Method	Analyzed	Analyst	Notes
General Chemistry											
<i>Batch ID > B343194</i>											
Total Dissolved Solids *	< 2.50	2.50		2.50	2.50	mg/L	SM2540C	SM2540C	10/25/23	SG	
Anions by Ion Chromatography											
<i>Batch ID > B344138</i>											
Chloride *	< 0.052	0.100		0.052	0.052	mg/L	EPA 300.0	EPA 300.0	10/28/23	SA	
Fluoride	< 0.018	0.020		0.018	0.018	mg/L	EPA 300.0	EPA 300.0	10/28/23	SG	
Sulfate *	< 0.06	0.10		0.06	0.06	mg/L	EPA 300.0	EPA 300.0	10/28/23	SA	
Total Metals By ICP											
<i>Batch ID > B343143</i>											
Boron	0.007	0.010	J	0.0006	0.0006	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	
Calcium *	0.122	1.00	J	0.009	0.009	mg/L	EPA 3010A	EPA 6010B	10/23/23	SJ	

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
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Notes:

Report No. 2310305

General Chemistry - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B343194 - SM2540C									
Blank (B343194-BLK1)				Prepared: 10/25/23 09:48 Analyzed: 10/25/23 17:46					
Total Dissolved Solids	<2.50	2.50	mg/L				-		
LCS (B343194-BS1)				Prepared: 10/25/23 09:48 Analyzed: 10/25/23 17:46					
Total Dissolved Solids	96.0	2.50	mg/L	100		96	80-120		
LCS Dup (B343194-BSD1)				Prepared: 10/25/23 09:48 Analyzed: 10/25/23 17:46					
Total Dissolved Solids	94.0	2.50	mg/L	100		94	80-120	2	20
Duplicate (B343194-DUP1)				Source: 2310305-01 Prepared: 10/25/23 09:48 Analyzed: 10/25/23 17:46					
Total Dissolved Solids	1920	3.57	mg/L		1940		-	1	20

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
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Notes:

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Anions by Ion Chromatography - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B344138 - EPA 300.0									
Blank (B344138-BLK1)					Prepared: 10/27/23 14:19 Analyzed: 10/27/23 17:41				
Fluoride	<0.020	0.020	mg/L				—		
Chloride	<0.100	0.100	mg/L				—		
Sulfate	<0.10	0.10	mg/L				—		
LCS (B344138-BS1)					Prepared: 10/27/23 14:19 Analyzed: 10/27/23 17:59				
Fluoride	0.919	0.020	mg/L	1.00		92	90–110		
Chloride	4.69	0.100	mg/L	5.00		94	90–110		
Sulfate	4.90	0.10	mg/L	5.00		98	90–110		
LCS Dup (B344138-BSD1)					Prepared: 10/27/23 14:19 Analyzed: 10/27/23 18:17				
Fluoride	0.916	0.020	mg/L	1.00		92	90–110	0.3	20
Chloride	4.70	0.100	mg/L	5.00		94	90–110	0.2	20
Sulfate	4.90	0.10	mg/L	5.00		98	90–110	0.1	20
Duplicate (B344138-DUP1)					Source: 2310305-02 Prepared: 10/27/23 14:19 Analyzed: 10/28/23 02:39				
Fluoride	0.101	0.020	mg/L		0.101		—	0.2	20
Chloride	168	0.100	mg/L		168		—	0.08	20
Sulfate	379	0.10	mg/L		265		—	35	20
Matrix Spike (B344138-MS1)					Source: 2310305-02 Prepared: 10/27/23 14:19 Analyzed: 10/28/23 02:57				
Fluoride	0.998	0.020	mg/L	1.00	0.101	90	80–120		
Chloride	166	0.100	mg/L	5.00	168	NR	80–120		M
Sulfate	367	0.10	mg/L	5.00	265	NR	80–120		M
Matrix Spike Dup (B344138-MSD1)					Source: 2310305-02 Prepared: 10/27/23 14:19 Analyzed: 10/28/23 03:33				
Fluoride	1.00	0.020	mg/L	1.00	0.101	90	80–120	0.2	20
Chloride	165	0.100	mg/L	5.00	168	NR	80–120	0.8	20
Sulfate	366	0.10	mg/L	5.00	265	NR	80–120	0.1	20

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
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Reported:
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Report No. 2310305

Total Mercury - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch B343169 - EPA 7470A									
Blank (B343169-BLK1)				Prepared: 10/24/23 11:30 Analyzed: 10/24/23 15:36					
Mercury	<0.0002	0.0002	mg/L				-		
LCS (B343169-BS1)				Prepared: 10/24/23 11:30 Analyzed: 10/24/23 15:42					
Mercury	0.0116	0.0002	mg/L	0.0100		116	85-115		L
LCS Dup (B343169-BSD1)				Prepared: 10/24/23 11:30 Analyzed: 10/24/23 15:44					
Mercury	0.0116	0.0002	mg/L	0.0100		116	85-115	0.1	25 L
Duplicate (B343169-DUP1)				Source: 2310294-09		Prepared: 10/24/23 11:30 Analyzed: 10/24/23 15:48			
Mercury	<0.0002	0.0002	mg/L		<0.0002		-		25
Matrix Spike (B343169-MS1)				Source: 2310294-09		Prepared: 10/24/23 11:30 Analyzed: 10/24/23 15:50			
Mercury	0.00919	0.0002	mg/L	0.0100	<0.0002	92	75-125		
Matrix Spike Dup (B343169-MSD1)				Source: 2310294-09		Prepared: 10/24/23 11:30 Analyzed: 10/24/23 15:53			
Mercury	0.00908	0.0002	mg/L	0.0100	<0.0002	91	75-125	1	25

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
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10/19/23 10:22

Notes:

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Total Metals By ICP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
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Batch B343143 - EPA 3010A

Blank (B343143-BLK1)

Prepared: 10/23/23 12:30 Analyzed: 10/23/23 13:14

Antimony	<0.010	0.010	mg/L				—		
Arsenic	<0.010	0.010	mg/L				—		
Barium	<0.010	0.010	mg/L				—		
Beryllium	<0.004	0.004	mg/L				—		
Boron	<0.010	0.010	mg/L				—		
Cadmium	<0.005	0.005	mg/L				—		
Calcium	<1.00	1.00	mg/L				—		
Chromium	<0.010	0.010	mg/L				—		
Cobalt	<0.010	0.010	mg/L				—		
Lead	<0.010	0.010	mg/L				—		
Molybdenum	<0.010	0.010	mg/L				—		
Selenium	<0.010	0.010	mg/L				—		
Thallium	<0.010	0.010	mg/L				—		

LCS (B343143-BS1)

Prepared: 10/23/23 12:30 Analyzed: 10/23/23 13:25

Antimony	2.08	0.010	mg/L	2.00	104	85–115
Arsenic	2.05	0.010	mg/L	2.00	103	85–115
Barium	2.01	0.010	mg/L	2.00	100	85–115
Beryllium	2.05	0.004	mg/L	2.00	103	85–115
Boron	2.08	0.010	mg/L	2.00	104	85–115
Cadmium	1.96	0.005	mg/L	2.00	98	85–115
Calcium	2.04	1.00	mg/L	2.00	102	85–115
Chromium	1.97	0.010	mg/L	2.00	99	85–115
Cobalt	2.08	0.010	mg/L	2.00	104	85–115
Lead	2.07	0.010	mg/L	2.00	103	85–115
Molybdenum	2.07	0.010	mg/L	2.00	104	85–115
Selenium	2.00	0.010	mg/L	2.00	100	85–115
Thallium	2.04	0.010	mg/L	2.00	102	85–115

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Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
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Notes:

Report No. 2310305

Total Metals By ICP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------

Batch B343143 - EPA 3010A

LCS Dup (B343143-BSD1)

Prepared: 10/23/23 12:30 Analyzed: 10/23/23 13:31

Antimony	2.11	0.010	mg/L	2.00		106	85-115	2	20
Arsenic	2.13	0.010	mg/L	2.00		107	85-115	4	20
Barium	2.04	0.010	mg/L	2.00		102	85-115	2	20
Beryllium	2.14	0.004	mg/L	2.00		107	85-115	4	20
Boron	2.13	0.010	mg/L	2.00		106	85-115	3	20
Cadmium	2.08	0.005	mg/L	2.00		104	85-115	6	20
Calcium	2.14	1.00	mg/L	2.00		107	85-115	5	20
Chromium	2.07	0.010	mg/L	2.00		103	85-115	5	20
Cobalt	2.14	0.010	mg/L	2.00		107	85-115	3	20
Lead	2.15	0.010	mg/L	2.00		107	85-115	4	20
Molybdenum	2.16	0.010	mg/L	2.00		108	85-115	4	20
Selenium	2.10	0.010	mg/L	2.00		105	85-115	4	20
Thallium	2.12	0.010	mg/L	2.00		106	85-115	4	20

Duplicate (B343143-DUP1)

Source: 2310305-01

Prepared: 10/23/23 12:30 Analyzed: 10/23/23 19:57

Antimony	<0.010	0.010	mg/L	<0.010		-			20
Arsenic	0.00750	0.010	mg/L	0.00830		-		10	20
Barium	0.0259	0.010	mg/L	0.0259		-		0	20
Beryllium	0.0155	0.004	mg/L	0.0155		-		0	20
Boron	0.369	0.010	mg/L	0.368		-		0.3	20
Cadmium	0.00110	0.005	mg/L	0.00100		-		10	20
Calcium	170	1.00	mg/L	168		-		1	20
Chromium	0.00570	0.010	mg/L	0.00560		-		2	20
Cobalt	0.121	0.010	mg/L	0.121		-		0.3	20
Lead	0.0141	0.010	mg/L	0.0145		-		3	20
Molybdenum	0.000700	0.010	mg/L	0.000800		-		13	20
Selenium	<0.010	0.010	mg/L	<0.010		-			20
Thallium	<0.010	0.010	mg/L	<0.010		-			20

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

Total Metals By ICP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------

Batch B343143 - EPA 3010A

Matrix Spike (B343143-MS1)		Source: 2310305-01		Prepared: 10/23/23 12:30		Analyzed: 10/23/23 20:03			
Antimony	1.11	0.010	mg/L	2.00	<0.010	56	75-125		M
Arsenic	1.52	0.010	mg/L	2.00	0.00830	75	75-125		
Barium	1.12	0.010	mg/L	2.00	0.0259	55	75-125		M
Beryllium	1.17	0.004	mg/L	2.00	0.0155	58	75-125		M
Boron	1.63	0.010	mg/L	2.00	0.368	63	75-125		M
Cadmium	3.52	0.005	mg/L	2.00	0.00100	176	75-125		M
Calcium	170	1.00	mg/L	2.00	168	140	75-125		M
Chromium	1.20	0.010	mg/L	2.00	0.00560	60	75-125		M
Cobalt	1.24	0.010	mg/L	2.00	0.121	56	75-125		M
Lead	2.07	0.010	mg/L	2.00	0.0145	103	75-125		
Molybdenum	2.34	0.010	mg/L	2.00	0.000800	117	75-125		
Selenium	2.21	0.010	mg/L	2.00	<0.010	110	75-125		
Thallium	2.17	0.010	mg/L	2.00	<0.010	108	75-125		

Matrix Spike Dup (B343143-MSD1)		Source: 2310305-01		Prepared: 10/23/23 12:30		Analyzed: 10/23/23 20:09				
Antimony	1.16	0.010	mg/L	2.00	<0.010	58	75-125	4	20	M
Arsenic	1.51	0.010	mg/L	2.00	0.00830	75	75-125	0.07	20	
Barium	1.13	0.010	mg/L	2.00	0.0259	55	75-125	0.5	20	M
Beryllium	1.16	0.004	mg/L	2.00	0.0155	57	75-125	0.9	20	M
Boron	1.62	0.010	mg/L	2.00	0.368	63	75-125	0.3	20	M
Cadmium	3.35	0.005	mg/L	2.00	0.00100	167	75-125	5	20	M
Calcium	161	1.00	mg/L	2.00	168	NR	75-125	5	20	M
Chromium	1.14	0.010	mg/L	2.00	0.00560	57	75-125	5	20	M
Cobalt	1.24	0.010	mg/L	2.00	0.121	56	75-125	0.5	20	M
Lead	2.04	0.010	mg/L	2.00	0.0145	101	75-125	1	20	
Molybdenum	2.30	0.010	mg/L	2.00	0.000800	115	75-125	2	20	
Selenium	2.18	0.010	mg/L	2.00	<0.010	109	75-125	2	20	
Thallium	2.14	0.010	mg/L	2.00	<0.010	107	75-125	1	20	

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

SAMPLE QUALIFIERS

A Sample was analyzed past hold time

DEFINITIONS

* TNI / NELAC accredited analyte

PQL Practical Quantitation Limit

MCL Maximum Contaminant Level

mg/Kg Milligrams per Kilogram (Parts per Million)

mg/L Milligrams per Liter (Parts per Million)

PPM Parts per Million

ND This qualifier indicates that the analyte was analyzed but not detected above the MDL

J This qualifier indicates that the analyte is an estimate value between MQL and MDL

SQL Sample Quantitation Limit

MQL Method Quantitation Limit

MDL Method Detection Limit

L LCS/LCSD recovery is outside QC limits, the results may have a slight bias.

M MS/MSD recovery is outside QC limits due to possible matrix interferences, results may have a slight bias .

S RPD is outside QC limits.

RMCCCL Recommended Maximum Concentration of Contaminants Level

μR/hr MicroRoentgens per hour (Measure of Radioactivity Level)

HT Sample received past holdtime

IC Improper Container for this analyte(s)

IT Improper Temperature

IP Improper preservation for this analyte(s)

V Insufficient Volume

B Sample collected in Bulk

AB VOA Vial contained air bubbles.

OP ortho-Phosphate was not filtered in the field within 15minutes of collection.

CCV Continuing Calibration Verification Standard.

ICV Initial Calibration Verification Standard.

Surr L Surrogate recovery is low outside QC limits.

Surr H Surrogate recovery is high outside QC limits.

NR Not Recovered due to source sample concentration exceeds spiked concentration.

Test Methods followed by the laboratory are referenced in the following approved methodology, unless otherwise specified.

Standard Methods for the Examination of Water and Wastewater, 23rd Edition, 2017
Methods for Chemical Analysis of Water and Wastes, EPA 600/4-79-020, Rev. March 1983
EPA SW Test Methods for the Examination of Solid Waste, SW-846, 1996

CPS Energy - Environmental Dept.
P.O. Box 1771
San Antonio TX, 78296-1771

Project: Calaveras Power Station-CCR Units Evaporation
Pond
Project Number: [none]
Project Manager: Chelsey Vasbinder

Reported:
11/22/23 16:30
Received:
10/19/23 10:22

Notes:

Report No. 2310305

Subcontracted Analyses

Subcontractor Lab	Lab Number	Analysis
Eurofins - St. Louis	2310305-06	Li_T
Eurofins - St. Louis	2310305-06	Radium 226_SUB
Eurofins - St. Louis	2310305-06	Radium 228_SUB

Aimee Landon For Marcela Gracia Hawk, President For

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.



Richard Hawk, General Manager

Client Information	Project Information	Laboratory Information	COC Information
CPS Energy - Environmental Dept. P.O. Box 1771 San Antonio TX 78296-1771 Phone: (210) 353-4719 Fax: (210) 353-4271	Calaveras Power Station-CCR Units Evaporation Pond Number: [none] Sample count: 7 TAT: 7	San Antonio Testing Laboratory 1610 S. Laredo St San Antonio TX 78207 Phone: 210-229-9920 Fax: 210-229-9921	Shipped via: Hand Delivered

#	Client Information	Analyses	Containers
#1	JKS-36-20231017-CCR 10/17/2023 13:27 Grab / Non-potable Water	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	250 mL Plastic HNO3 (1) 1 L Plastic Unpreserved (1)
Comments: TRRP REPORTING			
#2	JKS-47-20231018-CCR 10/18/2023 09:32 Grab / Non-potable Water	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	250 mL Plastic HNO3 (1) 1 L Plastic Unpreserved (1)
Comments: TRRP REPORTING			
#3	JKS-61-20231017-CCR 10/17/2023 14:27 Grab / Non-potable Water	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	250 mL Plastic HNO3 (1) 1 L Plastic Unpreserved (1)
Comments: TRRP REPORTING			
#4	JKS-63R-20231018-CCR 10/18/2023 10:23 Grab / Non-potable Water	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	250 mL Plastic HNO3 (1) 1 L Plastic Unpreserved (1)
Comments: TRRP REPORTING			
#5	JKS-64-20231018-CCR 10/18/2023 08:53 Grab / Non-potable Water	B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	250 mL Plastic HNO3 (1) 1 L Plastic Unpreserved (1)
Comments: TRRP REPORTING			
#6	JKS-72-20231017-CCR 10/17/2023 15:36 Grab / Non-potable Water	As_T TAT: 7 B_T TAT: 7 Ba_T TAT: 7 Be_T TAT: 7 Ca_T TAT: 7 Cd_T TAT: 7 Chloride_IC TAT: 7 Co_T TAT: 7 Cr_T TAT: 7 Fluoride_IC TAT: 7 Hg_T TAT: 7 Li_T TAT: 7 (Subcontracted to Eurofins - St. Louis) Mo_T TAT: 7 Pb_T TAT: 7 Sb_T TAT: 7	250 mL Plastic HNO3 (1) 1 L Plastic Unpreserved (1) 1 Gallon Plastic (1)

		Se_T TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7 TI_T TAT: 7	
Comments: TRRP REPORTING - Radium 226 & 228 Combined			
#7	EB-001-20231018-CCR 10/18/2023 13:40 Grab / Non-potable Water	Analyses B_T TAT: 7 Ca_T TAT: 7 Chloride_IC TAT: 7 Fluoride_IC TAT: 7 Sulfate_IC TAT: 7 TDS TAT: 7	Containers 250 mL Plastic HNO3 (1) 1 L Plastic Unpreserved (1)
Comments: TRRP REPORTING - Radium 226 & 228 Combined <i>BS</i>			

Sub Laboratory:	Eurofins - St. Louis 13715 Rider Trail North Earth City MO 63045 Number: (314) 298-8566 Laboratory: -
------------------------	---

3.4°C / 3.4°C TG #7

Relinquished by	Date/Time	Accepted by	Date/Time
<i>ED Partidge</i> ED Partidge	10-19-23 8:23	<i>Laurel Simmons</i> Laurel Simmons	10/19/23 8:23
<i>Laurel Simmons</i> Laurel Simmons	10-19-23 10:22	<i>ATL Amerlardon</i> ATL Amerlardon	OCT 19 2023

1022

Sample Receipt Checklist

Client: CPS Energy - Environmental Dept. Project: Calaveras Power Station-CCR Units Evapora	Project Manager: Marcela Gracia Hawk Project Number: [none]
--	--

Report To:

Chelsey Vasbinder

SATL Report Number: 2310305

Work Order Due by:	10/30/23 17:00 (7 day TAT)	
Received By:	Aimee Landon	Date Received: 10/19/23 10:22
Logged In By:	Aimee Landon	Date Logged In: 10/19/23 11:03

Sample(s) Received on ICE/evidence of Ice (cooler with melted ice,etc):	Yes
Sample temperature at receipt *:	3.4°C
Custody Seals Present:	No
All containers intact:	Yes
Sample labels/COC agree:	Yes
Samples Received within Holding time :	Yes
Samples appropriately preserved **:	Yes
Containers received broken/damaged/leaking:	No
Air bubbles present in VOA vials for VOC/TPH analyses, if applicable:	Not Applicable
TRRP 13 Reporting requested?	Yes
BacT Sample bottles filled to volume (100mL mark), if applicable:	Not Applicable
LCR Sample bottles filled to volume (1 Liter mark), if applicable:	Not Applicable
Subcontracting required for any analyses:	Yes
RUSH turnaround time requested:	No
Requested Turnaround Time:	No
Samples delivered via :	Hand Delivered
Air bill included if Samples were shipped:	No
Other deviations not meeting SATL sample acceptance criteria notated on CoC:	None

Notes:

* Samples delivered to the laboratory on the same day that they are collected may not meet thermal preservation criteria (>0°C but <6°C) but are acceptable, if they arrive on ice.

** If improperly preserved, notate client authorization on CoC to proceed with analysis.

 Checked By : Aimee Landon

 Date : 10/19/23 10:22

 SATL#FO001
 Revised 09/15/2022

ANALYTICAL REPORT

PREPARED FOR

Attn: Marcela Hawk
San Antonio Testing Laboratory, Inc.
1610 S Laredo Street
San Antonio, Texas 78207

Generated 11/22/2023 4:10:26 PM

JOB DESCRIPTION

Radiological Sampling

JOB NUMBER

160-51921-1

Eurofins St. Louis

Job Notes

This report may not be reproduced except in full, and with written approval from the laboratory. The results relate only to the samples tested. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins TestAmerica Project Manager.

Authorization



Generated
11/22/2023 4:10:26 PM

Authorized for release by
Rhonda Ridenhower, Business Unit Manager
Rhonda.Ridenhower@et.eurofinsus.com
Designee for
Micha Korrinhizer, Project Manager
Micha.Korrinhizer@et.eurofinsus.com
(314)298-8566



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Case Narrative

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Job ID: 160-51921-1

Laboratory: Eurofins St. Louis

Narrative

CASE NARRATIVE

Client: San Antonio Testing Laboratory, Inc.

Project: Radiological Sampling

Report Number: 160-51921-1

With the exceptions noted as flags or footnotes, standard analytical protocols were followed in the analysis of the samples and no problems were encountered or anomalies observed. In addition, all laboratory quality control samples were within established control limits, with any exceptions noted below. Each sample was analyzed to achieve the lowest possible reporting limit within the constraints of the method.

Eurofins Environment Testing attests to the validity of the laboratory data generated by Eurofins facilities reported herein. All analyses performed by Eurofins Environment Testing facilities were done using established laboratory SOPs that incorporate QA/QC procedures described in the application methods. Eurofins Environment Testing's operations groups have reviewed the data for compliance with the laboratory QA/QC plan, and data have been found to be compliant with laboratory protocols unless otherwise noted below.

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report.

Calculations are performed before rounding to avoid round-off errors in calculated results.

Proper preservation was noted for the methods performed on these samples, unless otherwise detailed below.

All soil/sediment sample results for radiochemistry analyses are based upon sample as dried and disaggregated with the exception of tritium, carbon-14, and iodine-129 by gamma spectroscopy unless requested as wet weight by the client.

Any minimum detectable concentration (MDC), critical value (DLC), or Safe Drinking Water Act detection limit (SDWA DL) is sample-specific unless otherwise stated elsewhere in this narrative.

Radiochemistry sample results are reported with the count date/time applied as the Activity Reference Date.

This laboratory report is confidential and is intended for the sole use of Eurofins TestAmerica and its client.

Receipt

The sample was received on 10/23/2023 12:00 PM. Unless otherwise noted below, the sample arrived in good condition and properly preserved and on ice. The temperature of the cooler at receipt time was 20.0°C

Receipt Exceptions:

The reference method requires samples to have a pH of less than 2. The following sample was received with a pH of 7: 2310305-06 (JKS-72-20231017-CCR) (160-51921-1). The samples were adjusted to the appropriate pH in the laboratory.

Lithium is not listed on the COC, but requested by the client via email.

Metals

The following samples was diluted due to the presence of calcium which interferes with lithium: 2310305-06 (JKS-72-20231017-CCR) (160-51921-1). Elevated reporting limits (RLs) are provided.

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Case Narrative

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Job ID: 160-51921-1 (Continued)

Laboratory: Eurofins St. Louis (Continued)

Gas Flow Proportional Counter

Radium-228 prep batch 633410:

The following sample did not meet the requested limit (RL) due to the reduced sample volume attributed to the presence of matrix interference. During preparation the analyst visually noted matrix effects. The data have been reported with this narrative. 2310305-06 (JKS-72-20231017-CCR) (160-51921-1)

No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

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CHAIN-OF-CUSTODY RECORD

REPORT TO:		INVOICE TO:		P.O. #	
COMPANY	SAF	COMPANY	SAF	REPORT NUMBER	
ADDRESS		ADDRESS			
CITY	STATE	ZIP	CITY	STATE	ZIP
ATTN	PHONE #		ATTN	PHONE #	
REQUESTED TURNAROUND TIME		REQUESTED TURNAROUND TIME		SAME DAY WHEN POSSIBLE	
IN BUSINESS DAYS & SURCHARGE		IN BUSINESS DAYS & SURCHARGE		+300%	
THE TURNAROUND TIME FOR SAMPLES RECEIVED AFTER 3:00 PM SHALL BEGIN AT 8:00 AM THE FOLLOWING BUSINESS DAY / SPECIAL REQ.					
PROJECT NAME/LOCATION/SITE	PROJECT NO.	PROJECT NO.	PROJECT NO.	PROJECT NO.	PROJECT NO.
SAMPLED BY	DATE	TIME	DATE	TIME	TIME
10/17/2022	10/17/2022	10/17/2022	10/17/2022	10/17/2022	10/17/2022
ANALYSIS REQUESTED					
PRESERVED WITH					
PCB/PAH/PAH - Pest / 608.3 / 808.1A / TC/P / SPLP / Total					
Herb 8151A					
Br / Cl / F / FC / HPC / NO3 / NO2/O-P / SO4					
COH / TC / FC / HPC / NO3 / NO2/O-P / SO4					
Water: Quality - Drinking / Livestock / Irrigation					
VOC / 8260 / 8270 / 825.1 / TC/P / SPLP / Total					
PAH / SVOC / 8270 / 825.1 / TC/P / SPLP / Total					
Metals 8 / 11 / 12 / 13 / TC/P / SPLP / Total					
BTEX/MTBE 8260 / TPH TX1005/TX1006					
SAMPLE IDENTIFICATION					
160-51921 Chain of Custody					
RECEIVED BY (SIGNATURE)					
RECEIVED BY (PRINT NAME)					
DATE / TIME					
RELINQUISHED BY (SIGNATURE)					
RELINQUISHED BY (PRINT NAME)					
DATE / TIME					
SUBCONTRACTED					
CUSTODY SEAL IN PLACE & INTACT					
YES					
NO					

Login Sample Receipt Checklist

Client: San Antonio Testing Laboratory, Inc.

Job Number: 160-51921-1

Login Number: 51921

List Source: Eurofins St. Louis

List Number: 1

Creator: Korrinhizer, Micha L

Question	Answer	Comment
Radioactivity wasn't checked or is \leq background as measured by a survey meter.	True	
The cooler's custody seal, if present, is intact.	True	
Sample custody seals, if present, are intact.	True	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	N/A	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	True	The pH was adjusted upon receipt.
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is $<6\text{mm}$ (1/4").	True	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

Definitions/Glossary

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Qualifiers

Metals

Qualifier	Qualifier Description
	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

Rad

Qualifier	Qualifier Description
G	The Sample MDC is greater than the requested RL.
U	Result is less than the sample detection limit.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
□	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Method Summary

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Method	Method Description	Protocol	Laboratory
6010D	Metals (ICP)	SW846	EET SL
903.0	Radium-226 (GFPC)	EPA	EET SL
904.0	Radium-228 (GFPC)	EPA	EET SL
Ra226_Ra228	Combined Radium-226 and Radium-228	TAL-STL	EET SL
3010A	Preparation, Total Metals	SW846	EET SL
PrecSep_0	Preparation, Precipitate Separation	None	EET SL
PrecSep-21	Preparation, Precipitate Separation (21-Day In-Growth)	None	EET SL

Protocol References:

EPA = US Environmental Protection Agency

None = None

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

TAL-STL = TestAmerica Laboratories, St. Louis, Facility Standard Operating Procedure.

Laboratory References:

EET SL = Eurofins St. Louis, 13715 Rider Trail North, Earth City, MO 63045, TEL (314)298-8566

Sample Summary

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
160-51921-1	2310305-06 (JKS-72-20231017-CCR)	Water	10/17/23 15:36	10/23/23 12:00

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13

Client Sample Results

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Client Sample ID: 2310305-06 (JKS-72-20231017-CCR)

Lab Sample ID: 160-51921-1

Date Collected: 10/17/23 15:36

Matrix: Water

Date Received: 10/23/23 12:00

Method: SW846 6010D - Metals (ICP)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Lithium	160	J	250	75	ug/L		11/08/23 11:55	11/22/23 12:03	5

Method: EPA 903.0 - Radium-226 (GFPC)

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	RL	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-226	2.14		0.443	0.483	1.00	0.292	pCi/L	10/25/23 11:00	11/21/23 09:30	1
Carrier	%Yield	Qualifier	Limits					Prepared	Analyzed	Dil Fac
Ba Carrier	75.3		30 - 110					10/25/23 11:00	11/21/23 09:30	1

Method: EPA 904.0 - Radium-228 (GFPC)

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	RL	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-228	3.59	G	1.32	1.36	1.00	1.69	pCi/L	10/25/23 11:05	11/15/23 11:38	1
Carrier	%Yield	Qualifier	Limits					Prepared	Analyzed	Dil Fac
Ba Carrier	75.3		30 - 110					10/25/23 11:05	11/15/23 11:38	1
Y Carrier	71.0		30 - 110					10/25/23 11:05	11/15/23 11:38	1

Method: TAL-STL Ra226_Ra228 - Combined Radium-226 and Radium-228

Analyte	Result	Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	RL	MDC	Unit	Prepared	Analyzed	Dil Fac
Combined Radium 226 + 228	5.73		1.39	1.44	5.00	1.69	pCi/L		11/22/23 11:07	1

QC Sample Results

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Method: 6010D - Metals (ICP)

Lab Sample ID: MB 160-635857/1-A
Matrix: Water
Analysis Batch: 637956

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 635857

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Lithium	ND		50	15	ug/L		11/08/23 11:55	11/22/23 09:20	1

Lab Sample ID: LCS 160-635857/2-A
Matrix: Water
Analysis Batch: 637956

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 635857

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits
Lithium	100	86.8		ug/L		87	80 - 120

Lab Sample ID: 160-51920-A-1-D MS
Matrix: Water
Analysis Batch: 637956

Client Sample ID: Matrix Spike
Prep Type: Total/NA
Prep Batch: 635857

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec Limits
Lithium	22		100	138		ug/L		116	75 - 125

Lab Sample ID: 160-51920-A-1-E MSD
Matrix: Water
Analysis Batch: 637956

Client Sample ID: Matrix Spike Duplicate
Prep Type: Total/NA
Prep Batch: 635857

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Lithium	22		100	139		ug/L		117	75 - 125	1	20

Method: 903.0 - Radium-226 (GFPC)

Lab Sample ID: MB 160-633403/1-A
Matrix: Water
Analysis Batch: 637733

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 633403

Analyte	MB Result	MB Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	RL	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-226	0.02040	U	0.0780	0.0780	1.00	0.146	pCi/L	10/25/23 11:00	11/21/23 09:30	1

Carrier	MB %Yield	MB Qualifier	Limits	Prepared	Analyzed	Dil Fac
Ba Carrier	98.2		30 - 110	10/25/23 11:00	11/21/23 09:30	1

Lab Sample ID: LCS 160-633403/2-A
Matrix: Water
Analysis Batch: 637733

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 633403

Analyte	Spike Added	LCS Result	LCS Qual	Total Uncert. (2σ+/-)	RL	MDC	Unit	%Rec	%Rec Limits
Radium-226	11.3	10.71		1.14	1.00	0.113	pCi/L	94	75 - 125

Carrier	LCS %Yield	LCS Qualifier	Limits
Ba Carrier	94.7		30 - 110

Eurofins St. Louis

QC Sample Results

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Method: 903.0 - Radium-226 (GFPC) (Continued)

Lab Sample ID: 160-51922-A-4-B DU
Matrix: Water
Analysis Batch: 637733

Client Sample ID: Duplicate
Prep Type: Total/NA
Prep Batch: 633403

Analyte	Sample Result	Sample Qual	DU Result	DU Qual	Total Uncert. (2σ+/-)	RL	MDC	Unit	RER	RER Limit
Radium-226	0.213		0.1515		0.101	1.00	0.139	pCi/L	0.31	1
Carrier	%Yield	DU Qualifier	DU	Limits						
Ba Carrier	96.7			30 - 110						

Method: 904.0 - Radium-228 (GFPC)

Lab Sample ID: MB 160-633410/1-A
Matrix: Water
Analysis Batch: 636863

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 633410

Analyte	MB Result	MB Qualifier	Count Uncert. (2σ+/-)	Total Uncert. (2σ+/-)	RL	MDC	Unit	Prepared	Analyzed	Dil Fac
Radium-228	0.3448	U	0.307	0.309	1.00	0.481	pCi/L	10/25/23 11:05	11/15/23 11:38	1
Carrier	%Yield	MB Qualifier	MB	Limits						
Ba Carrier	98.2			30 - 110						
Y Carrier	74.8			30 - 110						

Lab Sample ID: LCS 160-633410/2-A
Matrix: Water
Analysis Batch: 636863

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 633410

Analyte	Spike Added	LCS Result	LCS Qual	Total Uncert. (2σ+/-)	RL	MDC	Unit	%Rec	%Rec Limits
Radium-228	7.72	8.279		1.17	1.00	0.507	pCi/L	107	75 - 125
Carrier	%Yield	LCS Qualifier	LCS	Limits					
Ba Carrier	94.7			30 - 110					
Y Carrier	82.6			30 - 110					

Lab Sample ID: 160-51922-A-4-D DU
Matrix: Water
Analysis Batch: 636863

Client Sample ID: Duplicate
Prep Type: Total/NA
Prep Batch: 633410

Analyte	Sample Result	Sample Qual	DU Result	DU Qual	Total Uncert. (2σ+/-)	RL	MDC	Unit	RER	RER Limit
Radium-228	0.562		1.027		0.447	1.00	0.593	pCi/L	0.59	1
Carrier	%Yield	DU Qualifier	DU	Limits						
Ba Carrier	96.7			30 - 110						
Y Carrier	83.4			30 - 110						

QC Association Summary

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Metals

Prep Batch: 635857

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
160-51921-1	2310305-06 (JKS-72-20231017-CCR)	Total/NA	Water	3010A	
MB 160-635857/1-A	Method Blank	Total/NA	Water	3010A	
LCS 160-635857/2-A	Lab Control Sample	Total/NA	Water	3010A	
160-51920-A-1-D MS	Matrix Spike	Total/NA	Water	3010A	
160-51920-A-1-E MSD	Matrix Spike Duplicate	Total/NA	Water	3010A	

Analysis Batch: 637956

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
MB 160-635857/1-A	Method Blank	Total/NA	Water	6010D	635857
LCS 160-635857/2-A	Lab Control Sample	Total/NA	Water	6010D	635857
160-51920-A-1-D MS	Matrix Spike	Total/NA	Water	6010D	635857
160-51920-A-1-E MSD	Matrix Spike Duplicate	Total/NA	Water	6010D	635857

Analysis Batch: 637987

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
160-51921-1	2310305-06 (JKS-72-20231017-CCR)	Total/NA	Water	6010D	635857

Rad

Prep Batch: 633403

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
160-51921-1	2310305-06 (JKS-72-20231017-CCR)	Total/NA	Water	PrecSep-21	
MB 160-633403/1-A	Method Blank	Total/NA	Water	PrecSep-21	
LCS 160-633403/2-A	Lab Control Sample	Total/NA	Water	PrecSep-21	
160-51922-A-4-B DU	Duplicate	Total/NA	Water	PrecSep-21	

Prep Batch: 633410

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
160-51921-1	2310305-06 (JKS-72-20231017-CCR)	Total/NA	Water	PrecSep_0	
MB 160-633410/1-A	Method Blank	Total/NA	Water	PrecSep_0	
LCS 160-633410/2-A	Lab Control Sample	Total/NA	Water	PrecSep_0	
160-51922-A-4-D DU	Duplicate	Total/NA	Water	PrecSep_0	

Tracer/Carrier Summary

Client: San Antonio Testing Laboratory, Inc.
Project/Site: Radiological Sampling

Job ID: 160-51921-1

Method: 903.0 - Radium-226 (GFPC)

Matrix: Water

Prep Type: Total/NA

		Percent Yield (Acceptance Limits)	
Lab Sample ID	Client Sample ID	Ba (30-110)	
160-51921-1	2310305-06 (JKS-72-20231017-	75.3	
160-51922-A-4-B DU	Duplicate	96.7	
LCS 160-633403/2-A	Lab Control Sample	94.7	
MB 160-633403/1-A	Method Blank	98.2	
Tracer/Carrier Legend			
Ba = Ba Carrier			

Method: 904.0 - Radium-228 (GFPC)

Matrix: Water

Prep Type: Total/NA

		Percent Yield (Acceptance Limits)	
Lab Sample ID	Client Sample ID	Ba (30-110)	Y (30-110)
160-51921-1	2310305-06 (JKS-72-20231017-	75.3	71.0
160-51922-A-4-D DU	Duplicate	96.7	83.4
LCS 160-633410/2-A	Lab Control Sample	94.7	82.6
MB 160-633410/1-A	Method Blank	98.2	74.8
Tracer/Carrier Legend			
Ba = Ba Carrier			
Y = Y Carrier			

Appendix A

Laboratory Data Package Cover Page - Page 1 of 4

This data package is for Eurofins St. Louis job number 160-51921-1 and consists of:

- ☒ R1 - Field chain-of-custody documentation;
- ☒ R2 - Sample identification cross-reference;
- ☒ R3 - Test reports (analytical data sheets) for each environmental sample that includes:
 - a. Items consistent with NELAC Chapter 5,
 - b. dilution factors,
 - c. preparation methods,
 - d. cleanup methods, and
 - e. if required for the project, tentatively identified compounds (TICs).
- ☐ R4 - Surrogate recovery data including:
 - a. Calculated recovery (%R), and
 - b. The laboratory's surrogate QC limits.
- ☒ R5 - Test reports/summary forms for blank samples;
- ☒ R6 - Test reports/summary forms for laboratory control samples (LCSs) including:
 - a. LCS spiking amounts,
 - b. Calculated %R for each analyte, and
 - c. The laboratory's LCS QC limits.
- ☐ R7 - Test reports for project matrix spike/matrix spike duplicates (MS/MSDs) including:
 - a. Samples associated with the MS/MSD clearly identified,
 - b. MS/MSD spiking amounts,
 - c. Concentration of each MS/MSD analyte measured in the parent and spiked samples,
 - d. Calculated %Rs and relative percent differences (RPDs), and
 - e. The laboratory's MS/MSD QC limits
- ☐ R8 - Laboratory analytical duplicate (if applicable) recovery and precision:
 - a. The amount of analyte measured in the duplicate,
 - b. The calculated RPD, and
 - c. The laboratory's QC limits for analytical duplicates.
- ☒ R9 - List of method quantitation limits (MQLs) and detectability check sample results for each analyte for each method and matrix.
- ☒ R10 - Other problems or anomalies.

The Exception Report for each "No" or "Not Reviewed (NR)" item in Laboratory Review Checklist and for each analyte, matrix, and method for which the laboratory does not hold NELAC accreditation under the Texas Laboratory Accreditation Program.

Release Statement: I am responsible for the release of this laboratory data package. This laboratory is NELAC accredited under the Texas Laboratory Accreditation Program for all the methods, analytes, and matrices reported in this data package except as noted in the Exception Reports. The data have been reviewed and are technically compliant with the requirements of the methods used, except where noted by the laboratory in the Exception Reports. By my signature below, I affirm to the best of my knowledge all problems/anomalies observed by the laboratory have been identified in the Laboratory Review Checklist, and no information affecting the quality of the data has been knowingly withheld.

Micha Korrinhizer

Name (printed)



Signature

11/22/2023

Date

Project Manager

Official Title (printed)

Laboratory Review Checklist: Reportable Data - Page 2 of 4

Laboratory Name:	Eurofins St. Louis	LRC Date:	11/22/2023
Project Name:	Radiological Sampling	Laboratory Job Number:	160-51921-1
Reviewer Name:	Micha Korrinhizer		

# ¹	A ²	Description	Yes	No	NA ³	NR ⁴	ER# ⁵
R1	OI	Chain-of-custody (C-O-C)					
		Did samples meet the laboratory's standard conditions of sample acceptability upon receipt?	X				
		Were all departures from standard conditions described in an exception report?	X				
R2	OI	Sample and quality control (QC) identification					
		Are all field sample ID numbers cross-referenced to the laboratory ID numbers?	X				
		Are all laboratory ID numbers cross-referenced to the corresponding QC data?	X				
R3	OI	Test reports					
		Were all samples prepared and analyzed within holding times?	X				
		Other than those results < MQL, were all other raw values bracketed by calibration standards?	X				
		Were calculations checked by a peer or supervisor?	X				
		Were all analyte identifications checked by a peer or supervisor?	X				
		Were sample detection limits reported for all analytes not detected?	X				
		Were all results for soil and sediment samples reported on a dry weight basis?			X		
		Were % moisture (or solids) reported for all soil and sediment samples?			X		
		Were bulk soils/solids samples for volatile analysis extracted with methanol per SW846 Method 5035?			X		
		If required for the project, are TICs reported?			X		
R4	O	Surrogate recovery data					
		Were surrogates added prior to extraction?			X		
		Were surrogate percent recoveries in all samples within the laboratory QC limits?			X		
R5	OI	Test reports/summary forms for blank samples					
		Were appropriate type(s) of blanks analyzed?	X				
		Were blanks analyzed at the appropriate frequency?	X				
		Were method blanks taken through the entire analytical process, including preparation and, if applicable, cleanup procedures?	X				
		Were blank concentrations < MQL?	X				
R6	OI	Laboratory control samples (LCS):					
		Were all COCs included in the LCS?	X				
		Was each LCS taken through the entire analytical procedure, including prep and cleanup steps?	X				
		Were LCSs analyzed at the required frequency?	X				
		Were LCS (and LCSD, if applicable) %Rs within the laboratory QC limits?	X				
		Does the detectability check sample data document the laboratory's capability to detect the COCs at the MDL used to calculate the SDLs?	X				
		Was the LCSD RPD within QC limits?			X		
R7	OI	Matrix spike (MS) and matrix spike duplicate (MSD) data					
		Were the project/method specified analytes included in the MS and MSD?			X		
		Were MS/MSD analyzed at the appropriate frequency?			X		
		Were MS (and MSD, if applicable) %Rs within the laboratory QC limits?			X		
		Were MS/MSD RPDs within laboratory QC limits?			X		
R8	OI	Analytical duplicate data					
		Were appropriate analytical duplicates analyzed for each matrix?			X		
		Were analytical duplicates analyzed at the appropriate frequency?			X		
		Were RPDs or relative standard deviations within the laboratory QC limits?			X		
R9	OI	Method quantitation limits (MQLs):					
		Are the MQLs for each method analyte included in the laboratory data package?	X				
		Do the MQLs correspond to the concentration of the lowest non-zero calibration standard?	X				
		Are unadjusted MQLs and DCSs included in the laboratory data package?	X				
R10	OI	Other problems/anomalies					
		Are all known problems/anomalies/special conditions noted in this LRC and ER?	X				
		Was applicable and available technology used to lower the SDL to minimize the matrix interference effects on the sample results?		X			R10B
		Is the laboratory NELAC-accredited under the Texas Laboratory Accreditation Program for the analytes, matrices and methods associated with this laboratory data package?	X				

- Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.
- O = organic analyses; I = inorganic analyses (and general chemistry, when applicable);
- NA = Not applicable;
- NR = Not reviewed;
- ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).

Laboratory Review checklist: Supporting Data - Page 3 of 4

Laboratory Name:	Eurofins St. Louis	LRC Date:	11/22/2023
Project Name:	Radiological Sampling	Laboratory Job Number:	160-51921-1
Reviewer Name:	Micha Korrinhizer		

# ¹	A ²	Description	Yes	No	NA ³	NR ⁴	ER# ⁵
S1	OI	Initial calibration (ICAL)					
		Were response factors and/or relative response factors for each analyte within QC limits?	X				
		Were percent RSDs or correlation coefficient criteria met?	X				
		Was the number of standards recommended in the method used for all analytes?	X				
		Were all points generated between the lowest and highest standard used to calculate the curve?	X				
		Are ICAL data available for all instruments used?	X				
		Has the initial calibration curve been verified using an appropriate second source standard?	X				
S2	OI	Initial and continuing calibration verification (ICV and CCV) and continuing calibration blank (CCB):					
		Was the CCV analyzed at the method-required frequency?	X				
		Were percent differences for each analyte within the method-required QC limits?	X				
		Was the ICAL curve verified for each analyte?	X				
		Was the absolute value of the analyte concentration in the inorganic CCB < MDL?	X				
S3	O	Mass spectral tuning					
		Was the appropriate compound for the method used for tuning?			X		
		Were ion abundance data within the method-required QC limits?			X		
S4	O	Internal standards (IS)					
		Were IS area counts and retention times within the method-required QC limits?			X		
S5	OI	Raw data (NELAC Section 5.5.10)					
		Were the raw data (for example, chromatograms, spectral data) reviewed by an analyst?	X				
		Were data associated with manual integrations flagged on the raw data?	X				
S6	O	Dual column confirmation					
		Did dual column confirmation results meet the method-required QC?			X		
S7	O	Tentatively identified compounds (TICs)					
		If TICs were requested, were the mass spectra and TIC data subject to appropriate checks?			X		
S8	I	Interference Check Sample (ICS) results					
		Were percent recoveries within method QC limits?	X				
S9	I	Serial dilutions, post digestion spikes, and method of standard additions					
		Were percent differences, recoveries, and the linearity within the QC limits specified in the method?			X		
S10	OI	Method detection limit (MDL) studies					
		Was a MDL study performed for each reported analyte?	X				
		Is the MDL either adjusted or supported by the analysis of DCSS?	X				
S11	OI	Proficiency test reports					
		Was the laboratory's performance acceptable on the applicable proficiency tests or evaluation studies?	X				
S12	OI	Standards documentation					
		Are all standards used in the analyses NIST-traceable or obtained from other appropriate sources?	X				
S13	OI	Compound/analyte identification procedures					
		Are the procedures for compound/analyte identification documented?	X				
S14	OI	Demonstration of analyst competency (DOC)					
		Was DOC conducted consistent with NELAC Chapter 5?	X				
		Is documentation of the analyst's competency up-to-date and on file?	X				
S15	OI	Verification/validation documentation for methods (NELAC Chapter 5)					
		Are all the methods used to generate the data documented, verified, and validated, where applicable?	X				
S16	OI	Laboratory standard operating procedures (SOPs)					
		Are laboratory SOPs current and on file for each method performed?	X				
1. Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period. 2. O = organic analyses; I = inorganic analyses (and general chemistry, when applicable); 3. NA = Not applicable; 4. NR = Not reviewed; 5. ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).							

Laboratory Review Checklist: Exception Reports - Page 4 of 4

Laboratory Name:	Eurofins St. Louis	LRC Date:	11/22/2023
Project Name:	Radiological Sampling	Laboratory Job Number:	160-51921-1
Reviewer Name:	Micha Korrinhizer		

ER # ¹	Description
R10B	Method 6010D: preparation batch 160-635857 and analytical batch 160-637987 The following samples was diluted due to the presence of calcium which interferes with lithium: 2310305-06 (JKS-72-20231017-CCR) (160-51921-1). Elevated reporting limits (RLs) are provided.
Misc	
<div>1. Items identified by the letter "R" must be included in the laboratory data package submitted in the TRRP-required report(s). Items identified by the letter "S" should be retained and made available upon request for the appropriate retention period.</div> <div>2. O = organic analyses; I = inorganic analyses (and general chemistry, when applicable);</div> <div>3. NA = Not applicable;</div> <div>4. NR = Not reviewed;</div> <div>5. ER# = Exception Report identification number (an Exception Report should be completed for an item if "NR" or "No" is checked).</div>	



APPENDIX B STATISTICAL ANALYSIS TABLES AND FIGURES

JANUARY 2024

Appendix B - Table 1**Kruskal-Wallis Test Comparisons of Upgradient Wells****Calaveras Power Station****Evaporation Pond**

Analyte	N	N Detect	Percent Detect	DF	statistic	p-value	Conclusion	UPL Type
Boron	38	38	100.00%	1	20.4	<0.001	Significant Difference	Intrawell
Calcium	39	39	100.00%	1	28.4	<0.001	Significant Difference	Intrawell
Chloride	39	39	100.00%	1	28.4	<0.001	Significant Difference	Intrawell
Fluoride	39	21	53.85%	1	0.159	0.69	No Significant Difference	Interwell
pH	39	39	100.00%	1	0.272	0.602	No Significant Difference	Interwell
Sulfate	39	38	97.44%	1	22.4	<0.001	Significant Difference	Intrawell
TDS	39	39	100.00%	1	28.3	<0.001	Significant Difference	Intrawell

Notes

Non-detects were substituted with a value of half the detection limit for calculations.

N: number of data points

DF: degrees of freedom

statistic: Kruskal Wallis test statistic

p-value: P-values below 0.05 indicate that the median concentrations in the upgradient wells are significantly different from each other and the upgradient wells should not be pooled.

p-value: P-values equal or above 0.05 indicate that the median concentrations in the upgradient wells are not significantly different from each other and the upgradient wells can be pooled.

Appendix B - Table 2
Descriptive Statistics for Upgradient Wells
Calaveras Power Station
Evaporation Pond

Analyte	Well	Units	N	N Detect	Percent Detect	Min ND	Max ND	Min Detect	Median	Mean	Max Detect	SD	CV	Distribution
Boron	JKS-47	mg/L	21	21	100.00%			0.59	0.817	0.817	1.05	0.112	0.13701097	Normal
Boron	JKS-63	mg/L	17	17	100.00%			0.8	1.12	1.16	2.03	0.27	0.23202491	Lognormal
Calcium	JKS-47	mg/L	21	21	100.00%			26.2	62.1	66.7	168	33	0.49510928	Lognormal
Calcium	JKS-63	mg/L	18	18	100.00%			174	932	867	1200	273	0.31483636	NDD
Chloride	JKS-47	mg/L	21	21	100.00%			53.9	154	156	279	58.1	0.37158222	Normal
Chloride	JKS-63	mg/L	18	18	100.00%			1160	2300	2110	3020	636	0.30087508	Normal
Fluoride	Pooled	mg/L	39	21	53.85%	0.009	0.18	0.05	0.0971	0.118	0.382	0.121	1.02259573	NDD
pH	Pooled	SU	39	39	100.00%			4.58	5.85	5.82	6.6	0.365	0.0626251	NDD
Sulfate	JKS-47	mg/L	21	21	100.00%			171	266	268	369	50	0.18649811	Normal
Sulfate	JKS-63	mg/L	18	17	94.44%	0.023	0.023	1640	1840	1760	2120	455	0.25888282	NDD
TDS	JKS-47	mg/L	21	21	100.00%			665	904	911	1240	167	0.18280084	Normal
TDS	JKS-63	mg/L	18	18	100.00%			4760	6540	6920	10700	1910	0.27653674	Normal

Notes

Non-detects were substituted with a value of half the detection limit for calculations.

Well = Pooled, indicates that the summary statistics were produced for the pooled upgradient wells based on the Kruskal-Wallis test (Table 1).

SU: Standard units

N: number of data points

ND: Non-detect

SD: Standard Deviation

CV: Coefficient of Variation (standard deviation divided by the mean)

Appendix B - Table 3
Potential Outliers in Upgradient Wells
Calaveras Power Station
Evaporation Pond

Well	Sample	Date	Analyte	Units	Detect	Concentration	UPL type	Distribution	Statistical Outlier	Visual Outlier	Normal Outlier	Log Statistical Outlier	Log Visual Outlier	Lognormal Outlier	Statistical and Visual Outlier	Final Outlier Decision	Notes
JKS-63	63R001	08/20/2019	Boron	mg/L	TRUE	2.03	Intrawell	Lognormal	X	X	X	X	X	X	0		
JKS-47	JKS-47-WG-20191023-02	10/23/2019	pH	SU	TRUE	4.58	Interwell	NDD	X	X	X	X	X	X	0		
JKS-63	JKS-63R-WG-20191023-02	10/23/2019	pH	SU	TRUE	4.76	Interwell	NDD	X	X	X	X	X	X	0		

Notes

NDD: No Discernible Distribution

SU: Standard units

Outlier tests were performed on detected data only.

Statistical outliers were determined using a Dixon's test for $N < 25$ and with Rosner's test for $N > 25$.

Visual outliers were identified if they fall above the confidence envelope on the QQ plot.

Data points were considered potential outliers if they were both statistical and visual outliers.

NDD wells had data points considered as potential outliers if they were either a normal or lognormal outlier.

[Blank] data distribution indicates that the well data did not have enough detected data points for outlier analysis.

Lognormally distributed data was first log-transformed before visual and statistical outlier tests were performed.

Normal data distribution indicates that the well data was directly used for statistical and visual outlier tests.

NDD indicates that both the untransformed and transformed data were examined with statistical and visual outlier tests.

'0' indicates that the data point was a statistical and visual outlier but was retained after review by the hydrogeologist.

Appendix B - Table 4
Mann Kendall Test for Trends in Upgradient Wells
Calaveras Power Station
Evaporation Pond

Analyte	UPL Type	Well	N	Num Detects	Percent Detect	p-value	tau	Conclusion
Boron	Intrawell	JKS-47	21	21	100.00%	0.492	0.114	Stable, No Trend
Boron	Intrawell	JKS-63	17	17	100.00%	0.0523	0.349	Stable, No Trend
Calcium	Intrawell	JKS-47	21	21	100.00%	0.88	-0.0239	Stable, No Trend
Calcium	Intrawell	JKS-63	18	18	100.00%	0.0229	0.393	Increasing Trend
Chloride	Intrawell	JKS-47	21	21	100.00%	0.525	-0.101	Stable, No Trend
Chloride	Intrawell	JKS-63	18	18	100.00%	<0.001	0.778	Increasing Trend
Fluoride	Interwell	S-47, JKS-63	39	21	53.85%	0.0216	-0.273	Decreasing Trend
pH	Interwell	S-47, JKS-63	39	39	100.00%	<0.001	0.466	Increasing Trend
Sulfate	Intrawell	JKS-47	21	21	100.00%	0.698	-0.0667	Stable, No Trend
Sulfate	Intrawell	JKS-63	18	17	94.44%	0.879	-0.0266	Stable, No Trend
TDS	Intrawell	JKS-47	21	21	100.00%	0.612	-0.0857	Stable, No Trend
TDS	Intrawell	JKS-63	18	18	100.00%	<0.001	0.647	Increasing Trend

Notes

Non-detects were substituted with a value of zero for trend calculations.

N: number of data points

tau: Kendall's tau statistic

p-value: A two-sided p-value describing the probability of the H0 being true ($\alpha=0.05$).

Trend tests were performed on all upgradient data, only if the dataset met the minimum data quality criteria (ERM 2017)

Appendix B - Table 5
Calculated Prediction Limits for Upgradient Datasets
Calaveras Power Station
Evaporation Pond

Analyte	UPL Type	Trend	Well	N	Num Detects	Percent Detects	LPL	UPL	Units	Method	Final LPL	Final UPL	Notes
Boron	Intrawell	Stable, No Trend	JKS-47	21	21	100.00%		1.01	mg/L, 95% UPL (t)				
Boron	Intrawell	Stable, No Trend	JKS-63	17	17	100.00%		1.65	mg/L, 95% UPL (t)			X	
Calcium	Intrawell	Stable, No Trend	JKS-47	21	21	100.00%		125	mg/L, 95% UPL (t)				
Calcium	Intrawell	Increasing Trend	JKS-63	18	18	100.00%		1410	mg/L trended UPL			X	
Chloride	Intrawell	Stable, No Trend	JKS-47	21	21	100.00%		259	mg/L, 95% UPL (t)				
Chloride	Intrawell	Increasing Trend	JKS-63	18	18	100.00%		3570	mg/L trended UPL			X	
Fluoride	Interwell	Decreasing Trend (S-47, JKS-63)	JKS-63	39	21	53.85%		0.243	mg/L trended UPL			X	
pH	Interwell	Increasing Trend (S-47, JKS-63)	JKS-63	39	39	100.00%	5.08	6.68	SU trended UPL		X	X	
Sulfate	Intrawell	Stable, No Trend	JKS-47	21	21	100.00%		356	mg/L, 95% UPL (t)				
Sulfate	Intrawell	Stable, No Trend	JKS-63	18	17	94.44%		2550	mg/L % KM UPL (t)			X	
TDS	Intrawell	Stable, No Trend	JKS-47	21	21	100.00%		1210	mg/L, 95% UPL (t)				
TDS	Intrawell	Increasing Trend	JKS-63	18	18	100.00%		11600	mg/L trended UPL			X	

Notes

Non-detects were substituted with a value of half the detection limit for calculations.

UPL: upper prediction limit

LPL: Lower prediction limit. These were only calculated for pH

UPLs were constructed with a site wide false positive rate of 0.1 and a 1 of 2 retesting.

UPLs were calculated using ProUCL software.

SU: Standard units

NP: non parametric

RL: Reporting Limit

Intra: indicates an intrawell UPL was used.

Inter: indicates an interwell UPL was used.

In the case where multiple UPLs were calculated for an analyte, the maximum UPL was used as the final UPL.

In the case where multiple LPLs were calculated for an pH the minimum LPL was used as the final LPL.

Appendix B - Table 6
Comparisons of Downgradient Wells to Prediction Limits
Calaveras Power Station
Evaporation Pond

Analyte	Well	LPL	UPL	Units	Recent Date	Observation	Qualifier	Obs > UPL	Notes	Mann Kendall p-value	Mann Kendall tau	WRS p-value	WRS Conclusion	Exceed Median	Overall Conclusion
Fluoride	JKS-36		0.243	mg/L	10/17/2023	0.517		X	Trend Test: Stable, No Trend	0.603	0.0847	<0.001	***	X	Both Exceedance
Fluoride	JKS-61		0.243	mg/L	10/17/2023	0.445		X	Trend Test: Decreasing Trend	0.0433	-0.332	0.0191	*	X	Both Exceedance
pH	JKS-36	5.08	6.68	SU	10/17/2023	6.99		X	Trend Test: Stable, No Trend	0.542	0.105	0.166	NS		UPL Exceedance
pH	JKS-61	5.08	6.68	SU	10/17/2023	7.51		X	Trend Test: Stable, No Trend	0.717	0.0574	0.955	NS		UPL Exceedance

Notes

Non-detects were substituted with a value of zero for trend calculations.

UPL: Upper Prediction Limit

ND: Not detected

SU: Standard units

tau: Kendall's tau statistic

Obs > UCL: Exceed 'X' indicates that the most recent observed value is higher than the UPL (or out of range of the LPL and UPL in the case of pH).

Obs > UCL: Exceed 'X0' indicates that the two most recent values are higher than the UPL, but the upgradient well is 100% ND.

Obs > UCL: Exceed '0' indicated that the most recent observed value is higher than the UPL, but is not scored as an SSI due to Double Quantification Rule (ERM 2017).

WRS: Wilcoxon Rank Sum test comparing if median of downgradient well is larger than the UPL (for pH, also checks if median is less than LPL).

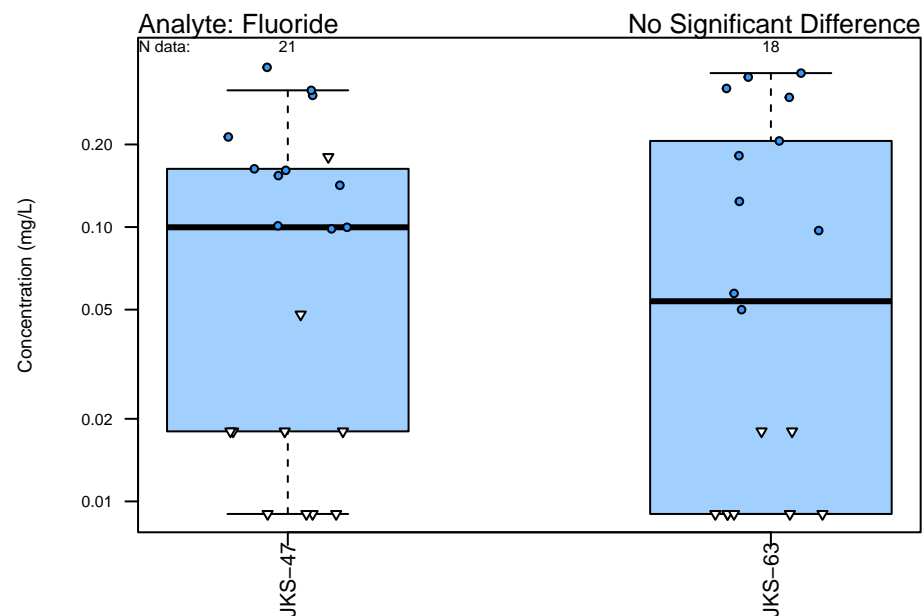
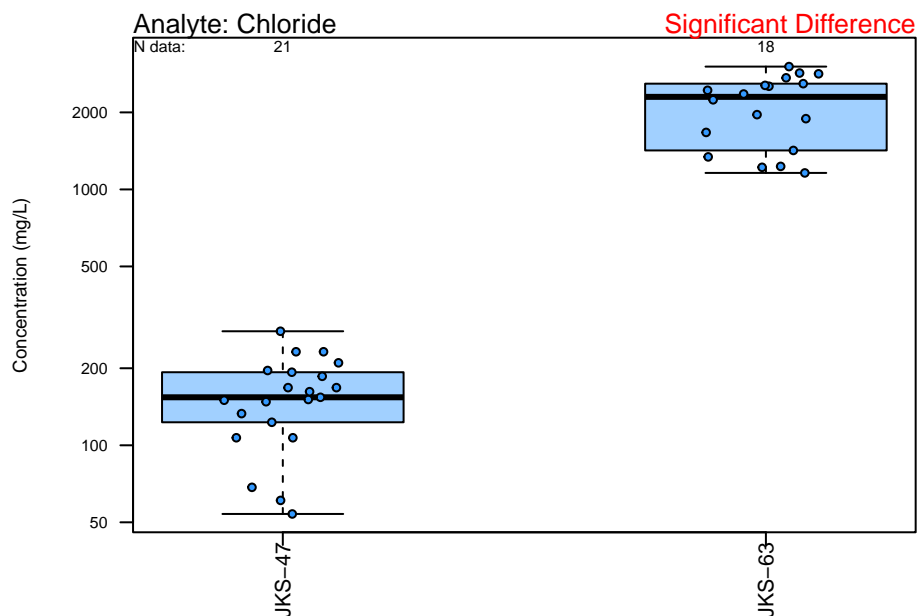
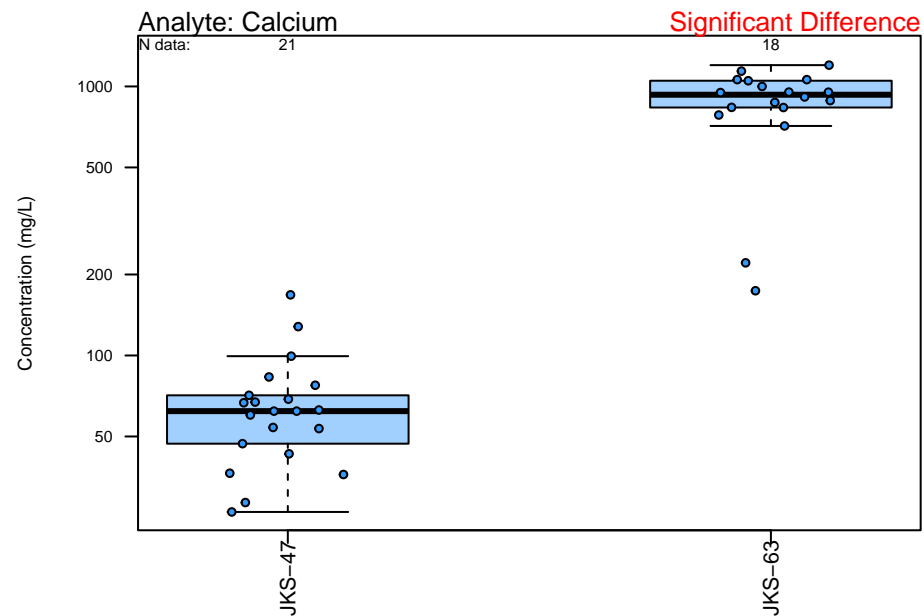
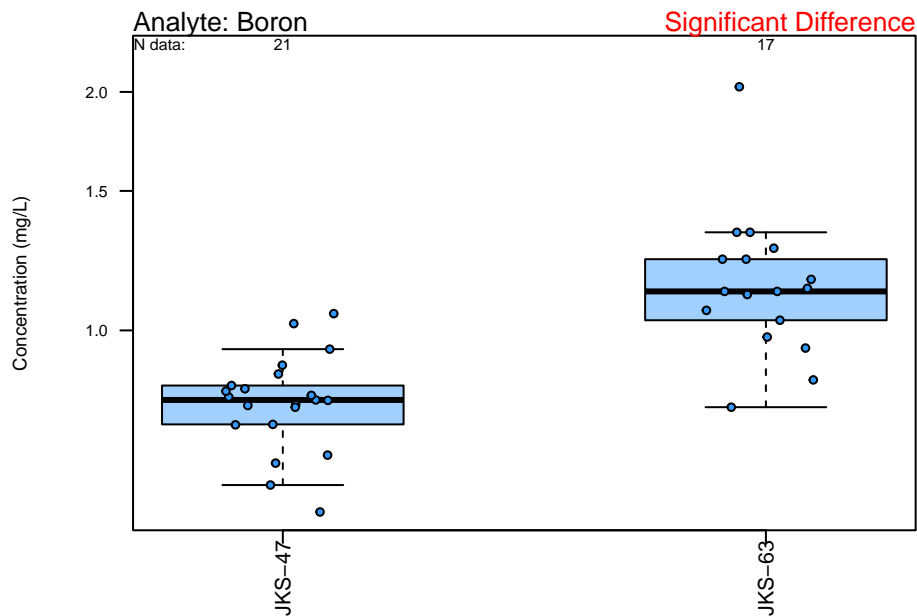
WRS p-value: A one-sided p-value describing the probability of the H0 (UPL/LPL) being true (a=0.05).

Overall: UPL Exceedance - most recent sampling event exceeds the UPL, but median of the well is not greater than UPL.

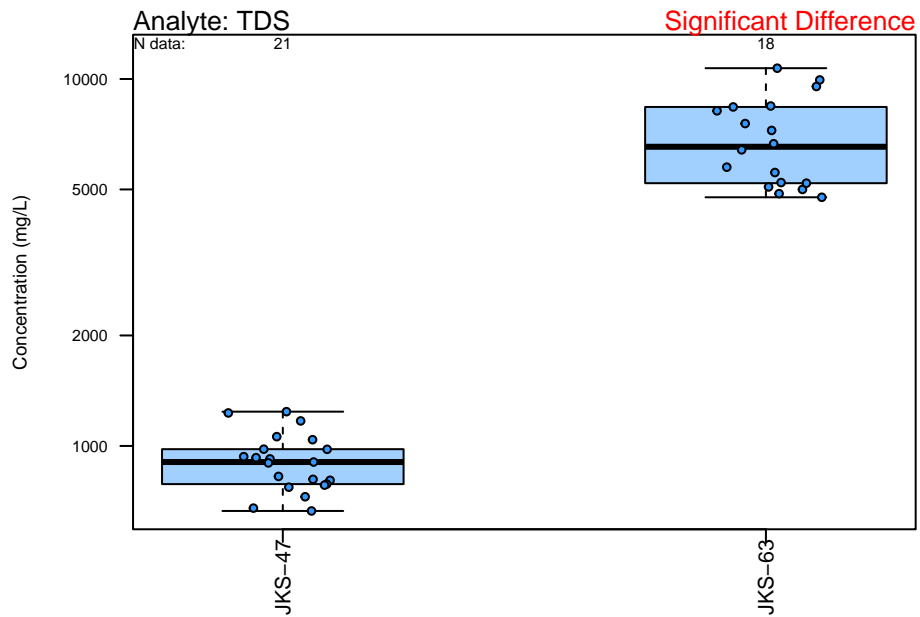
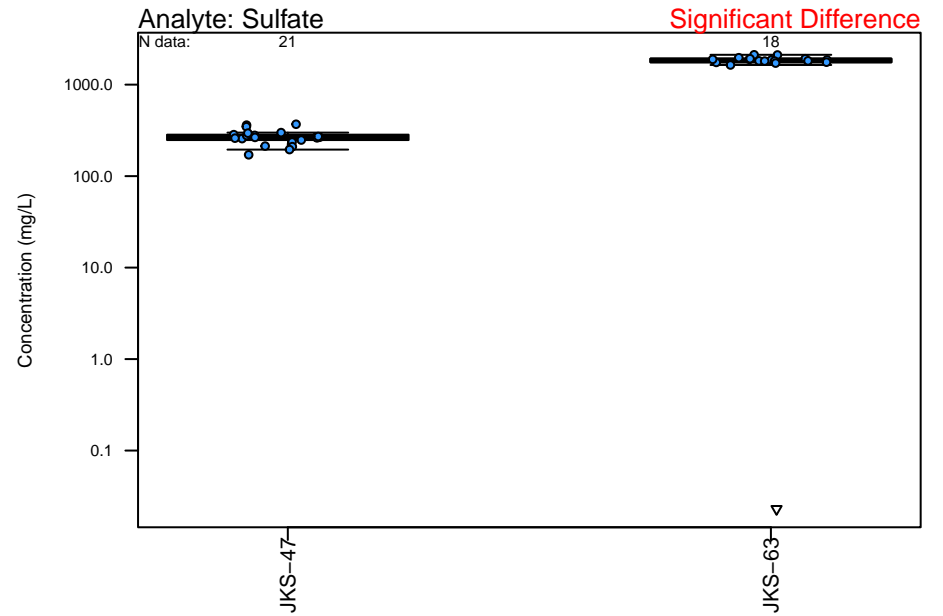
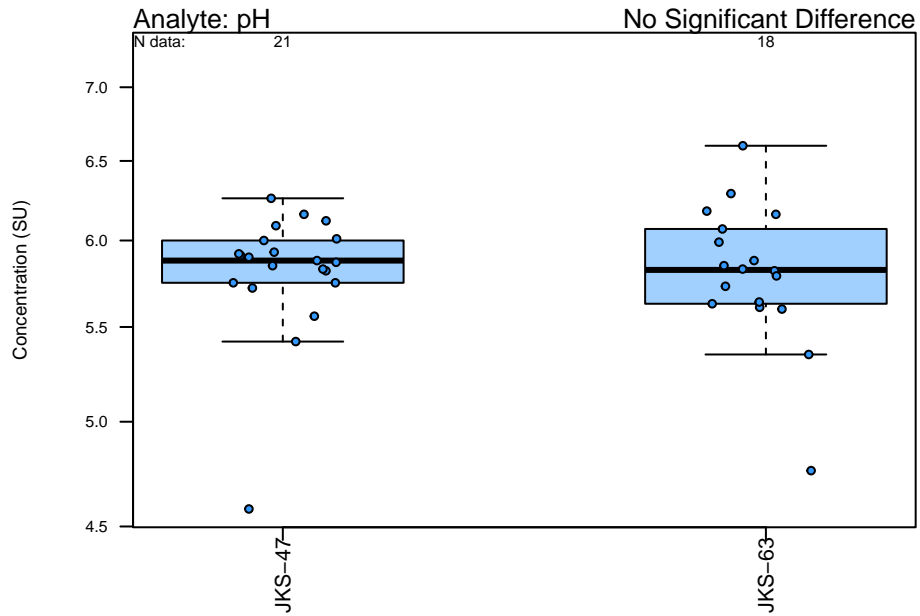
Overall: WRS Exceedance - most recent sampling event does not exceed the UPL, but median of the well is greater than UPL.

Overall: Both Exceedance - most recent sampling event exceeds the UPL and median of the well is larger than the UPL.

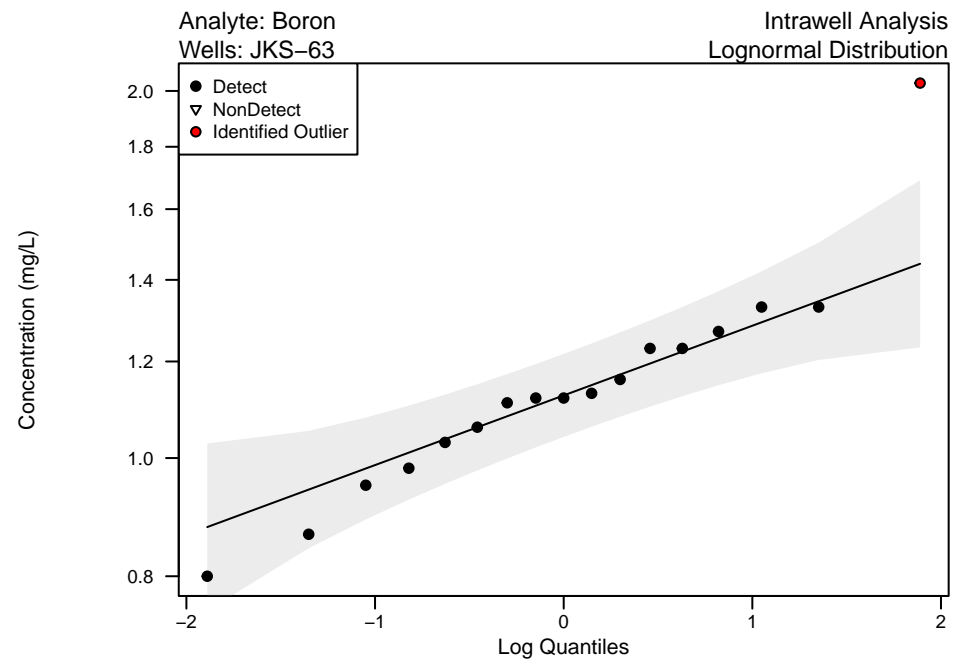
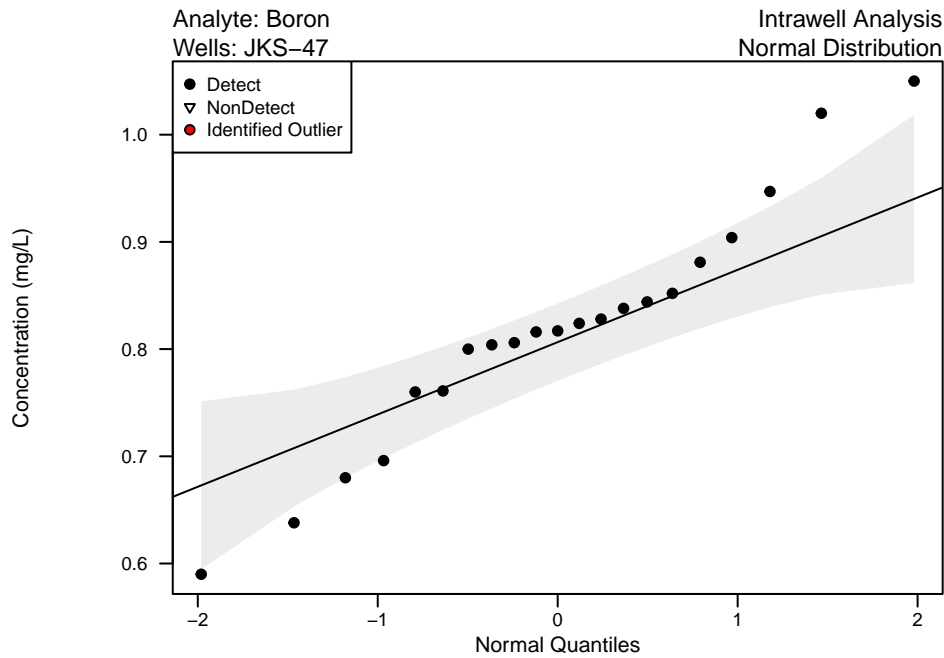
Appendix B – Figure 1
Unit: Evaporation Pond
Boxplots of Upgradient Wells



Appendix B – Figure 1
Unit: Evaporation Pond
Boxplots of Upgradient Wells

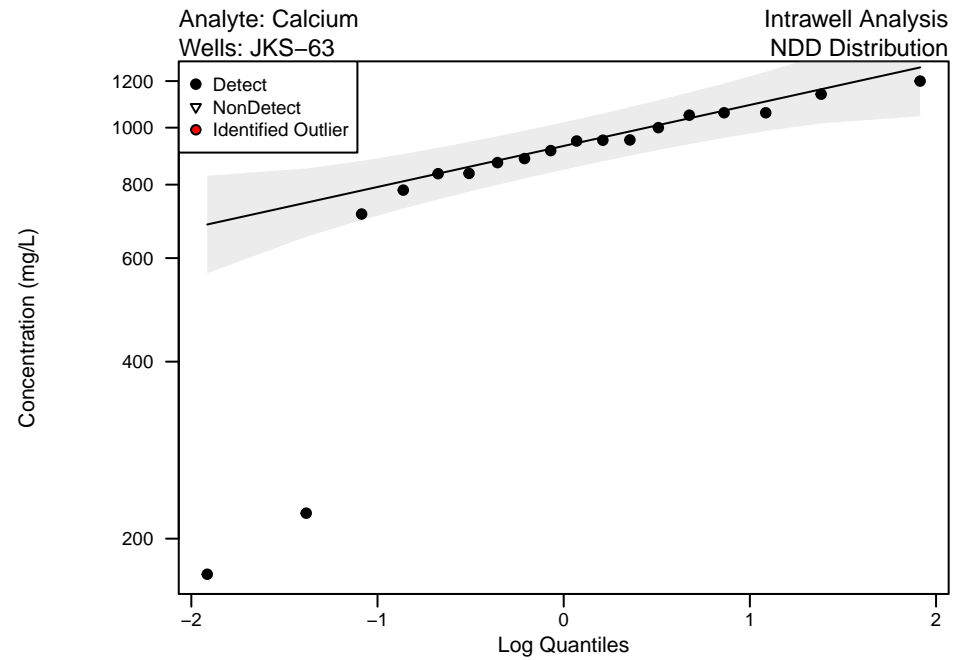
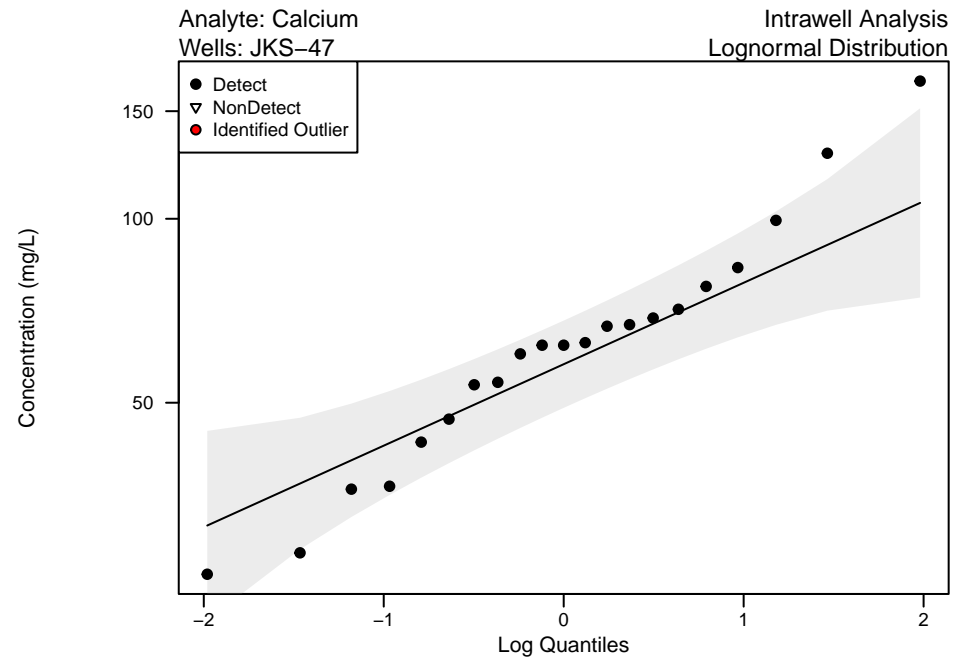
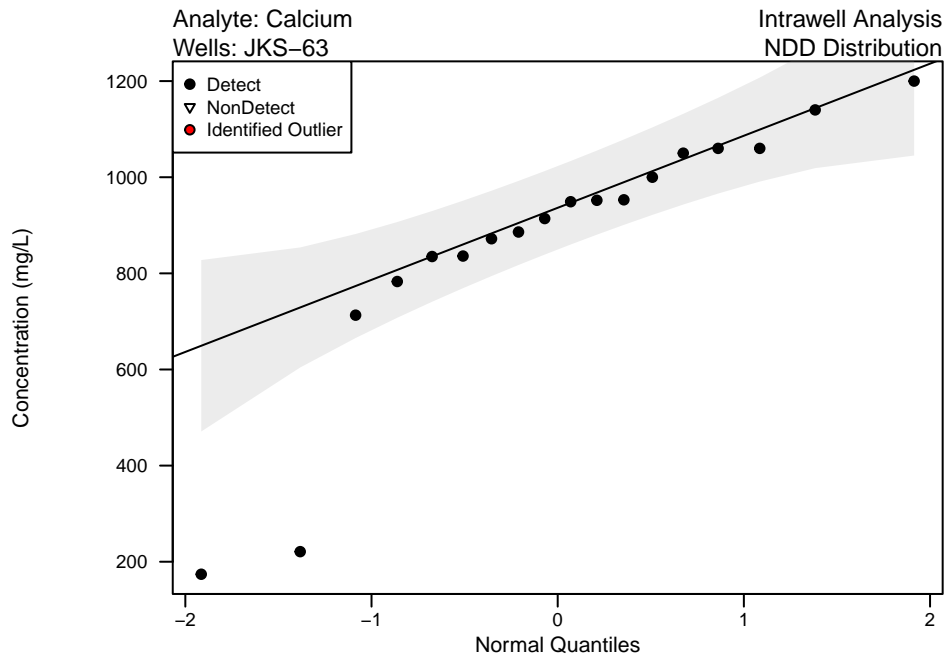


Appendix B – Figure 2
Unit: Evaporation Pond
QQ Plots of Upgradient Wells

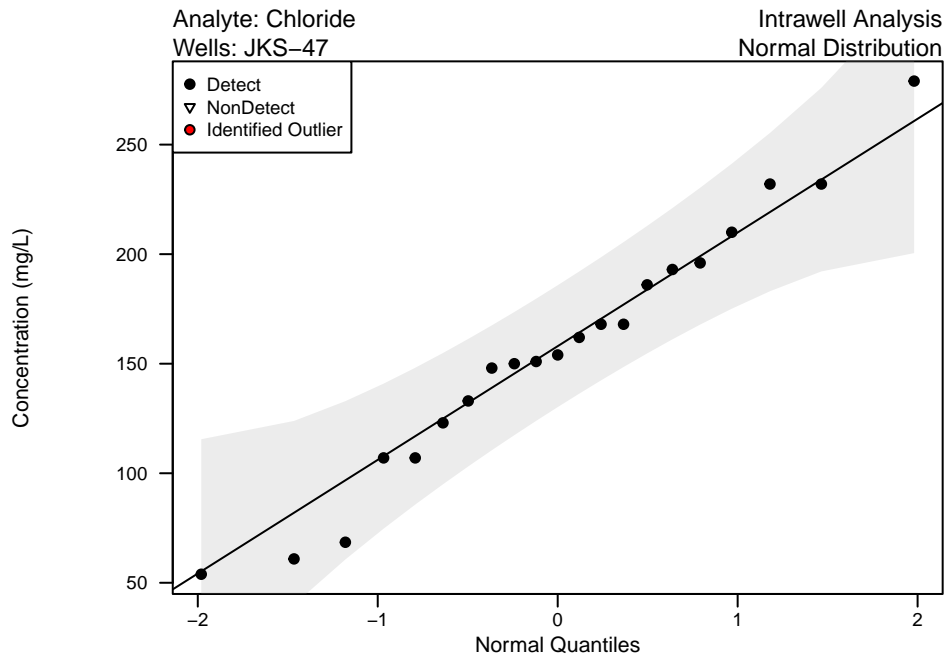


Appendix B – Figure 2
Unit: Evaporation Pond
QQ Plots of Upgradient Wells

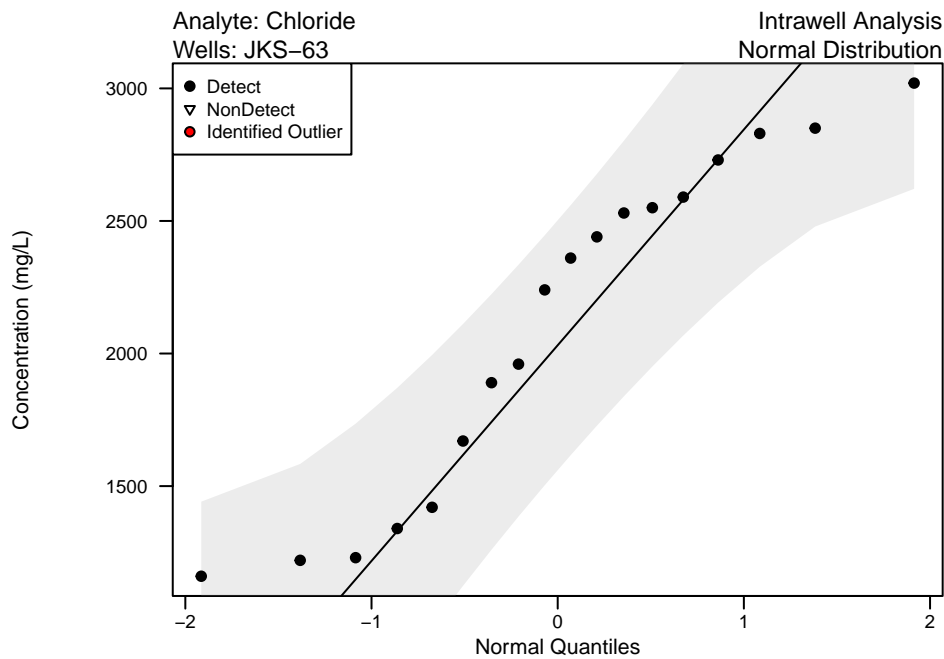
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Appendix B – Figure 2
Unit: Evaporation Pond
QQ Plots of Upgradient Wells

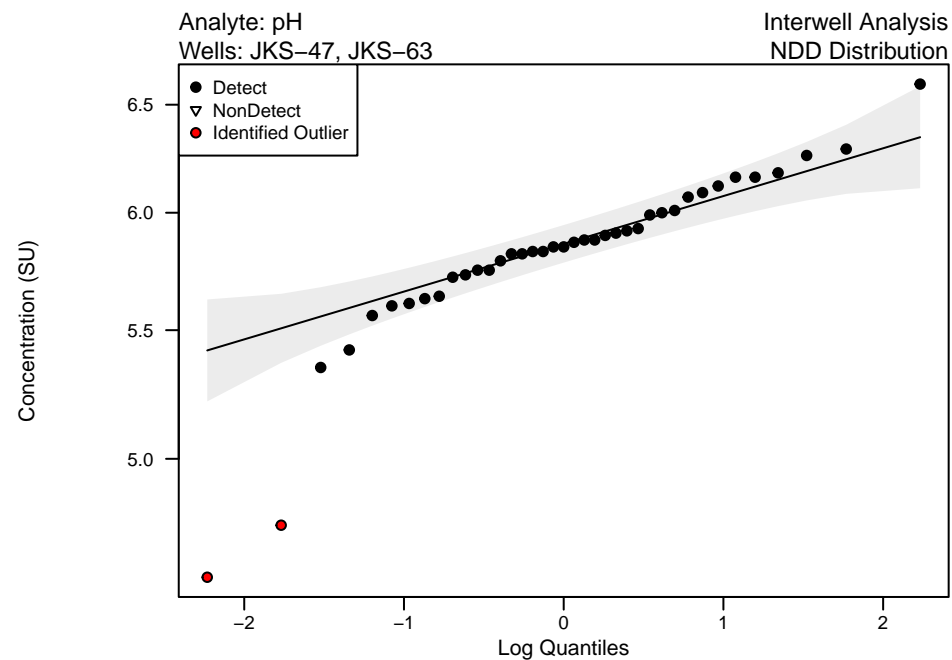
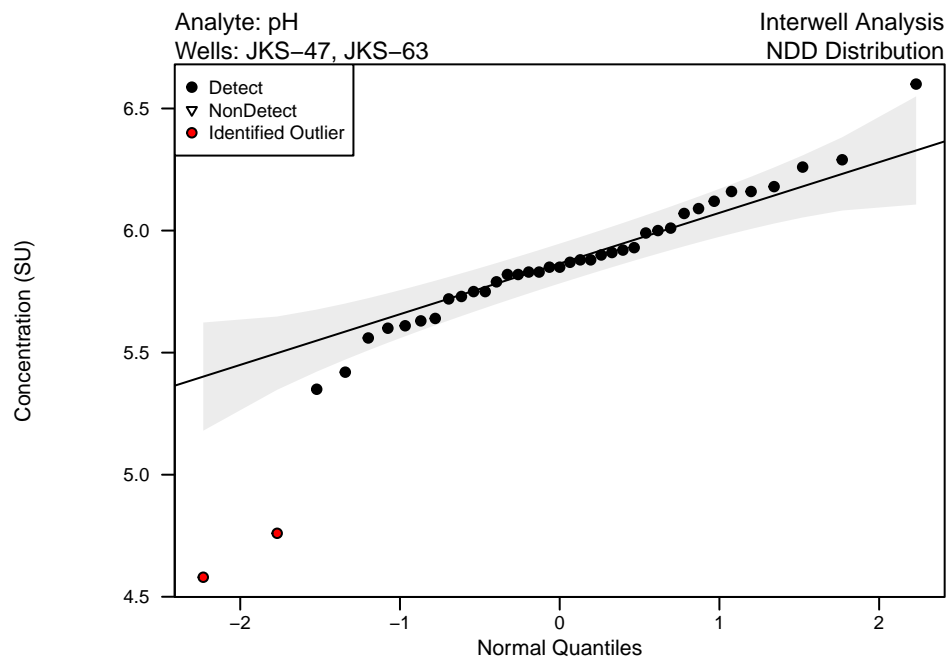
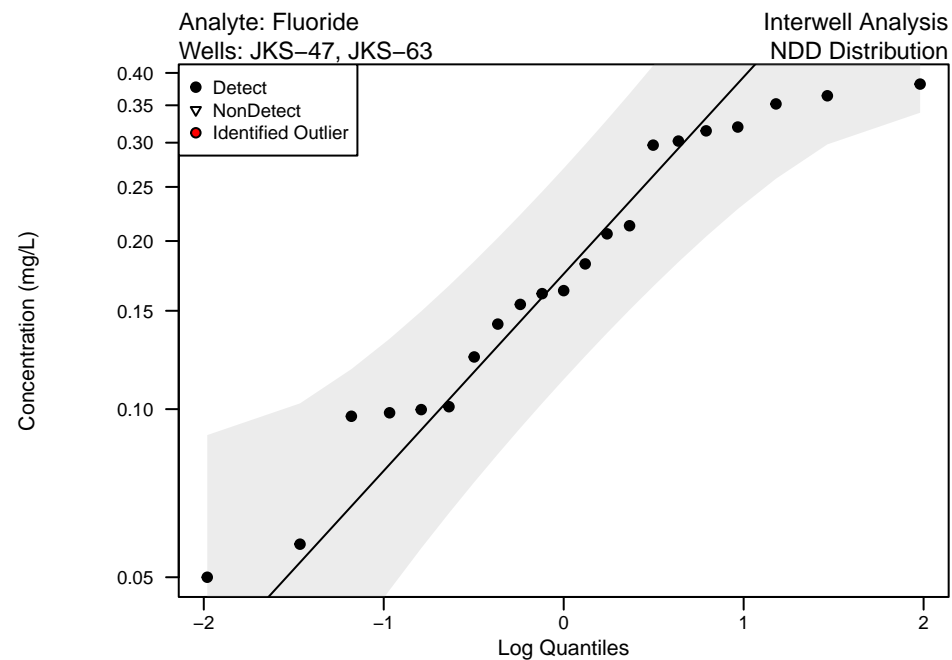
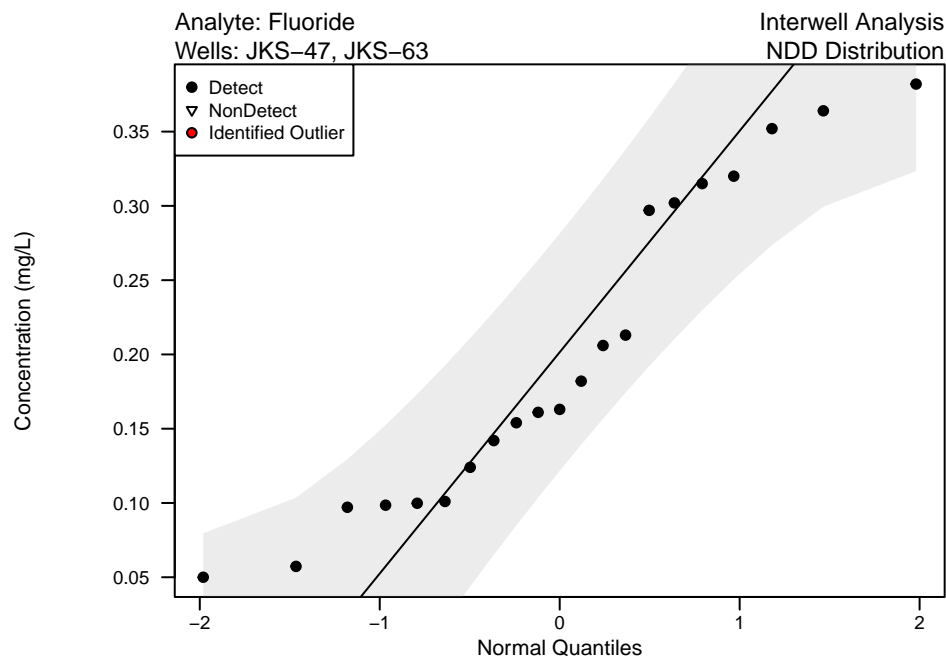


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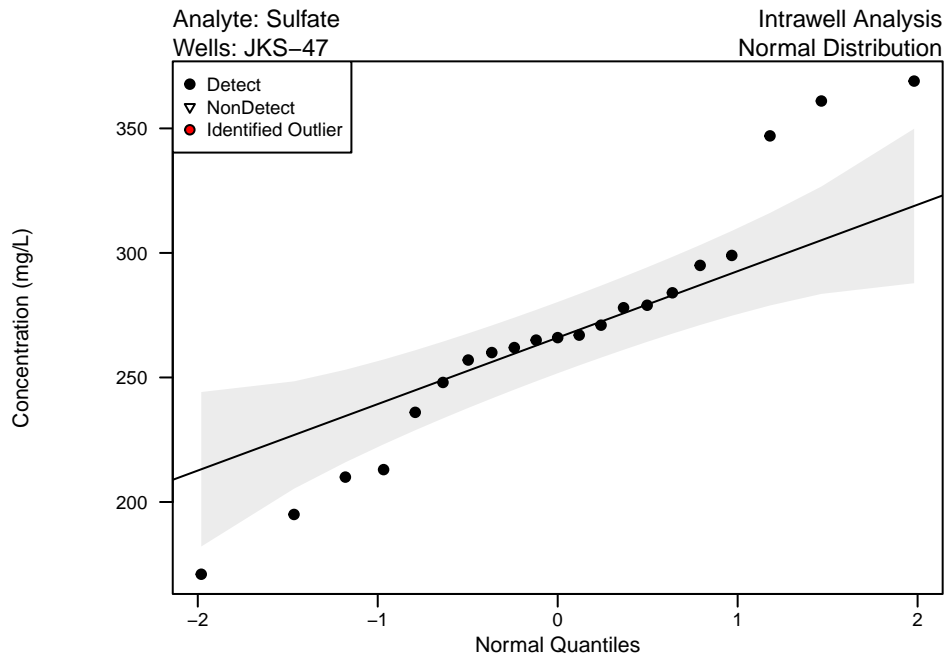


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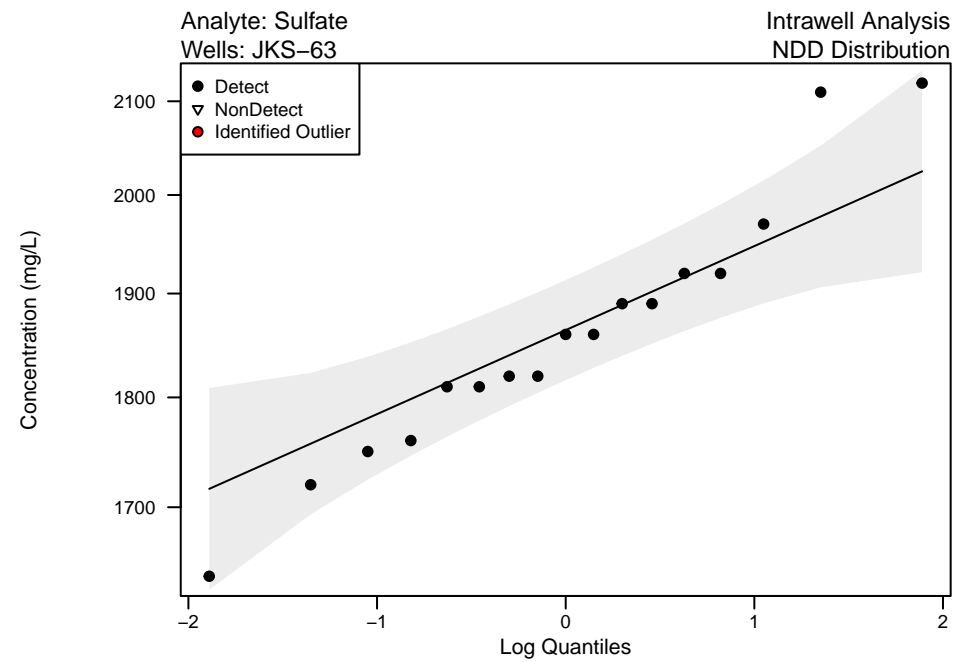
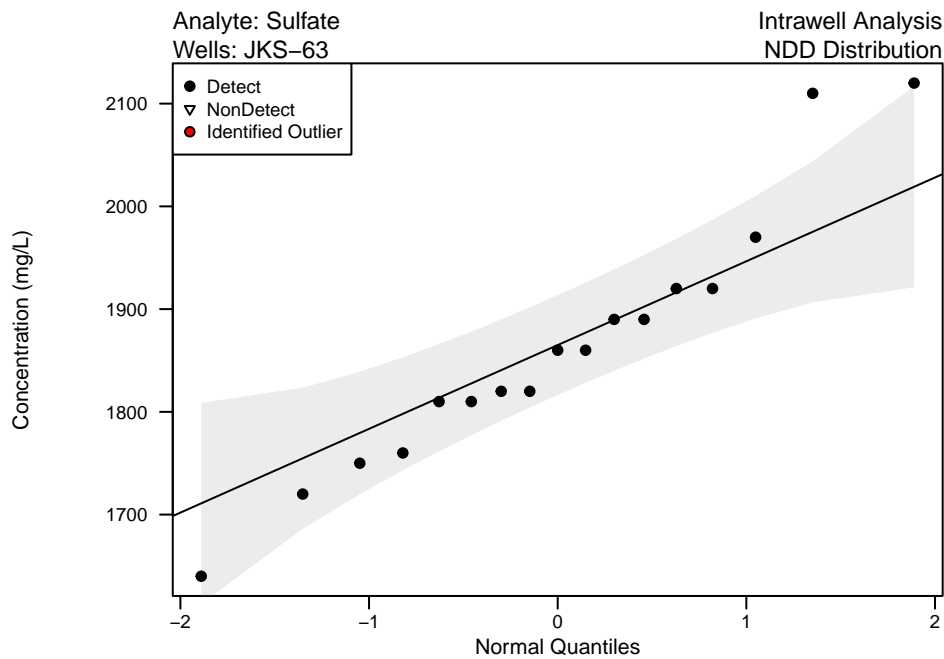
Appendix B – Figure 2
Unit: Evaporation Pond
QQ Plots of Upgradient Wells



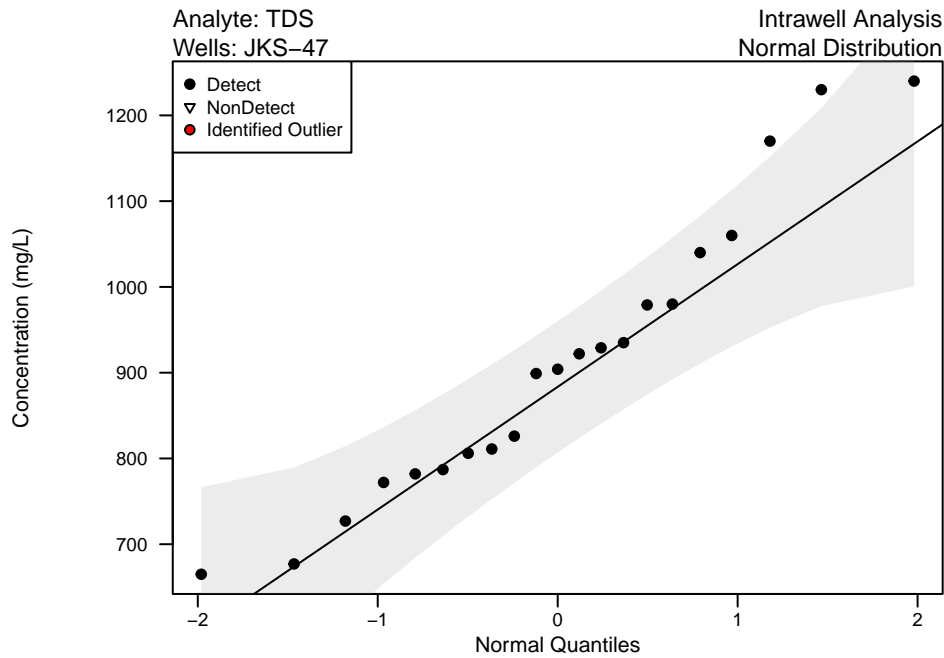
Appendix B – Figure 2
Unit: Evaporation Pond
QQ Plots of Upgradient Wells



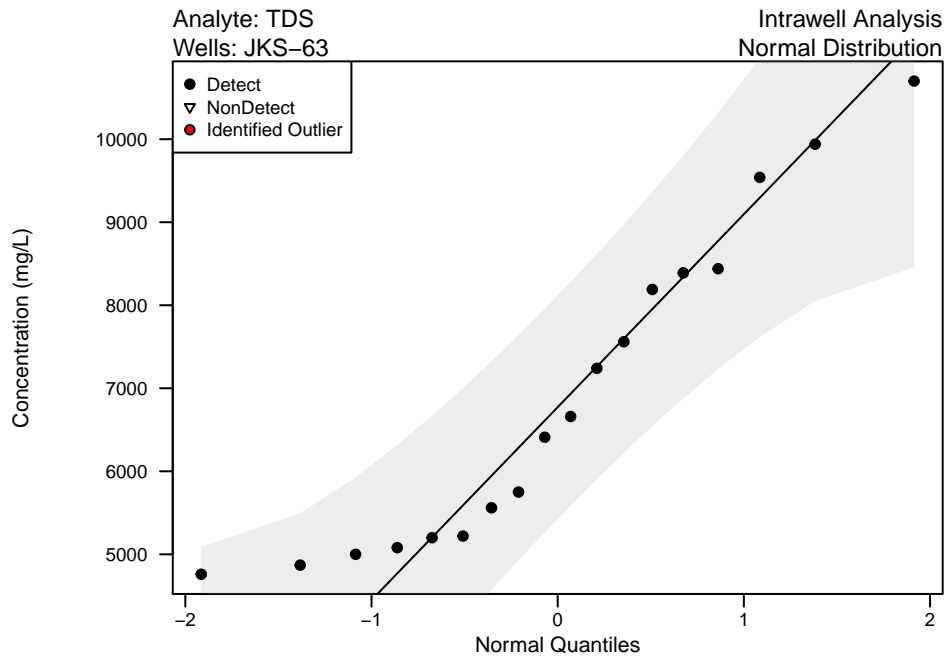
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Unit: Evaporation Pond
QQ Plots of Upgradient Wells

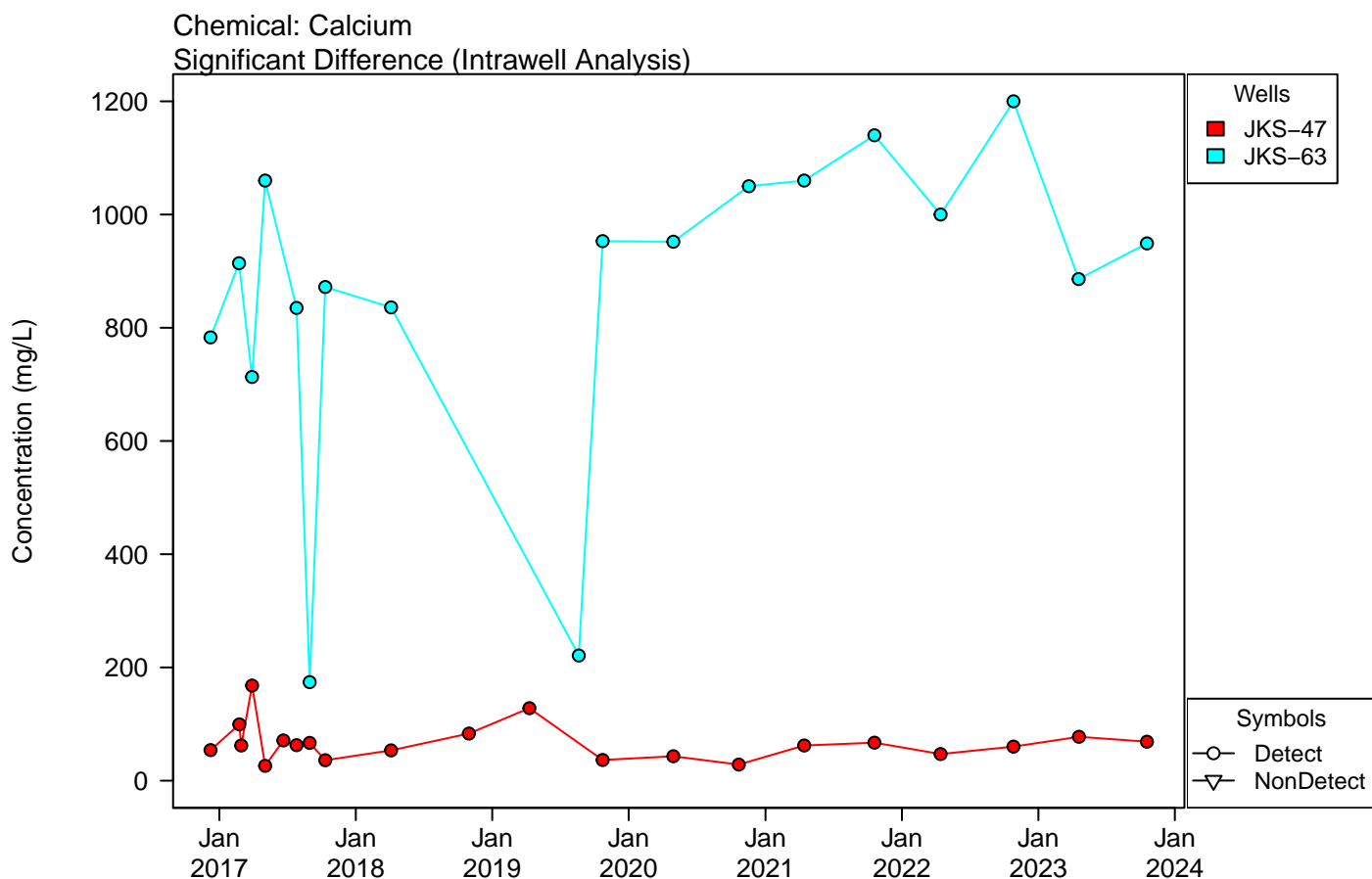
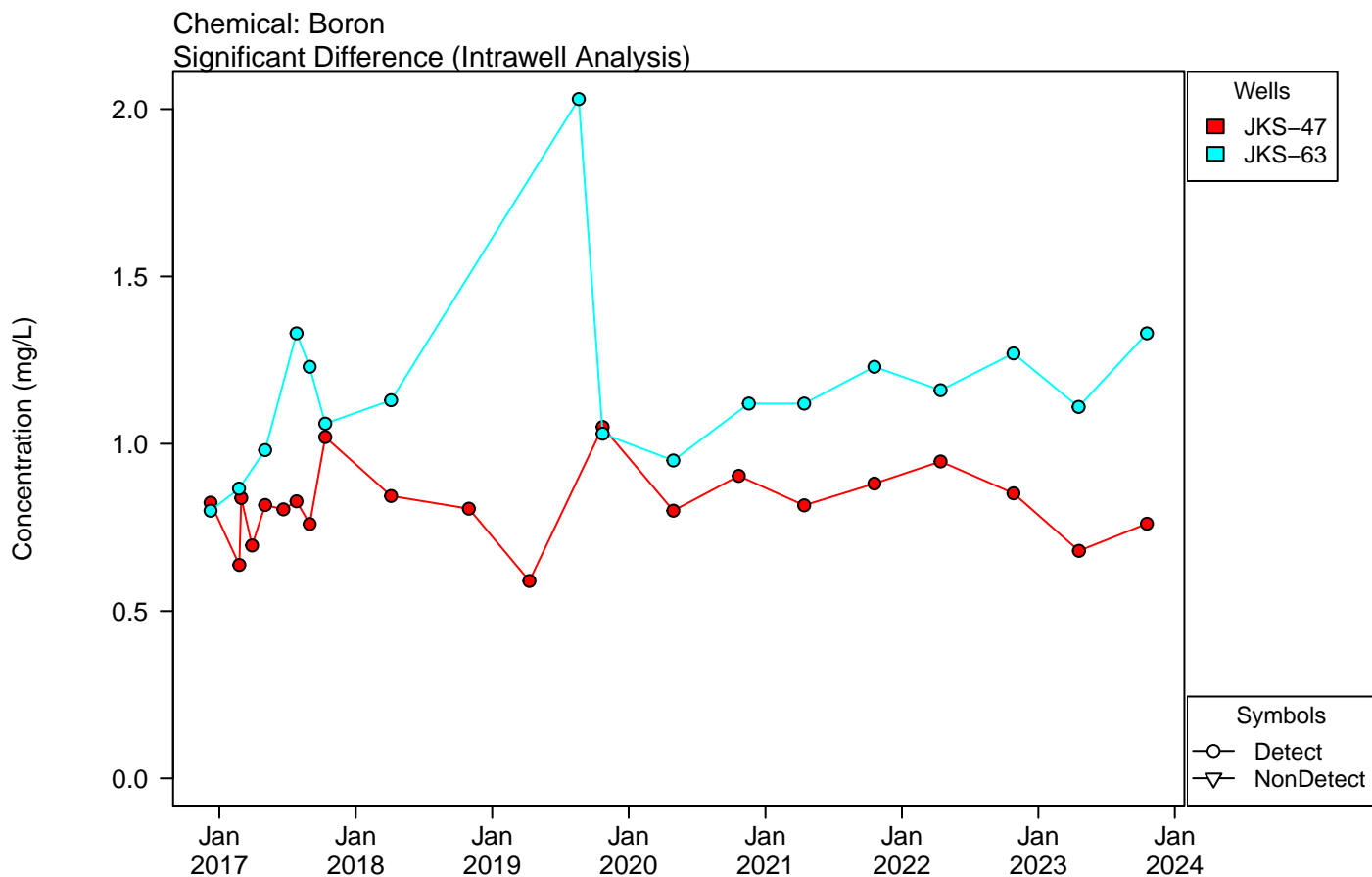


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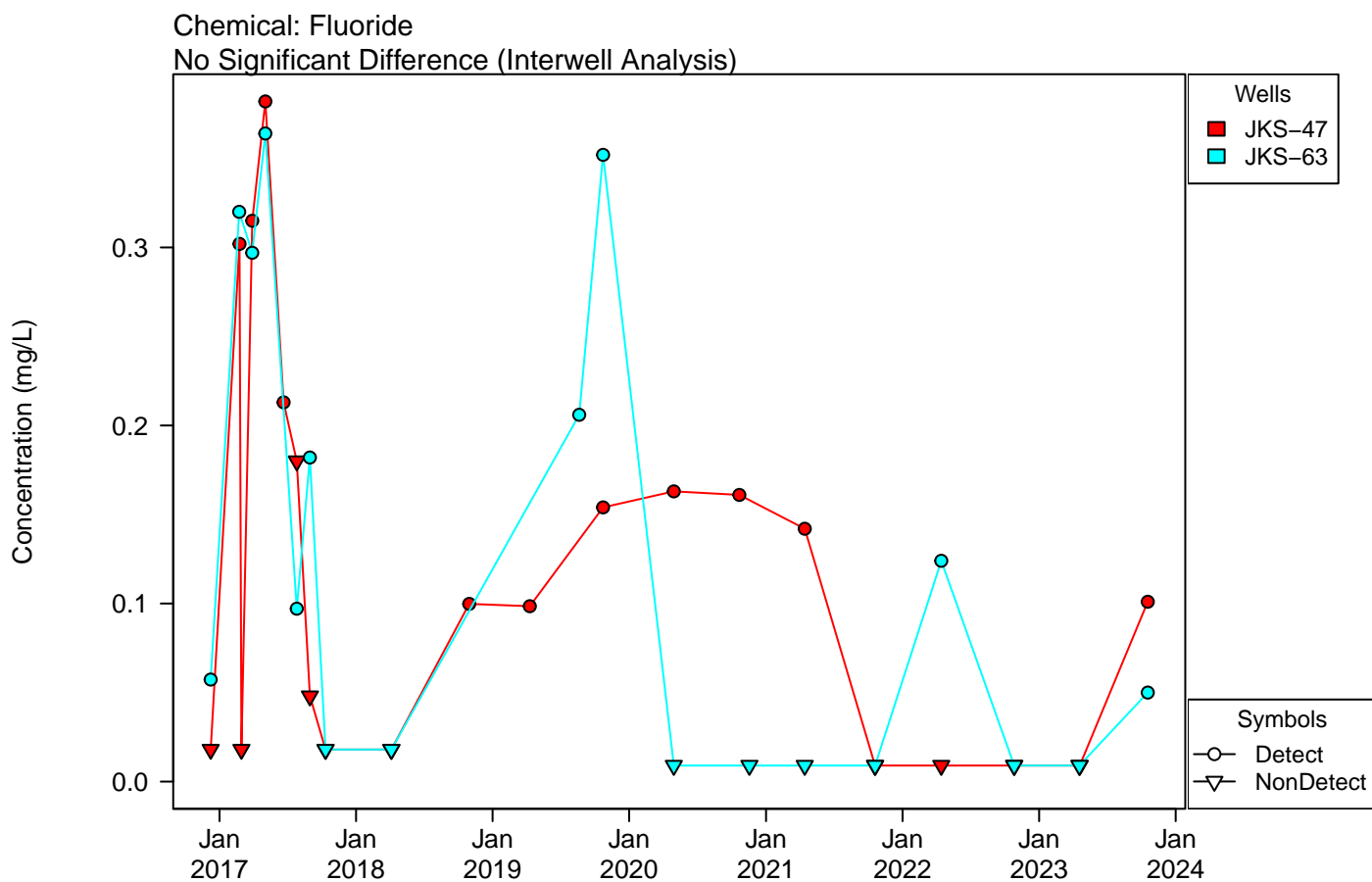


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Appendix B – Figure 3
Unit: Evaporation Pond
Timeseries of Upgradient Wells

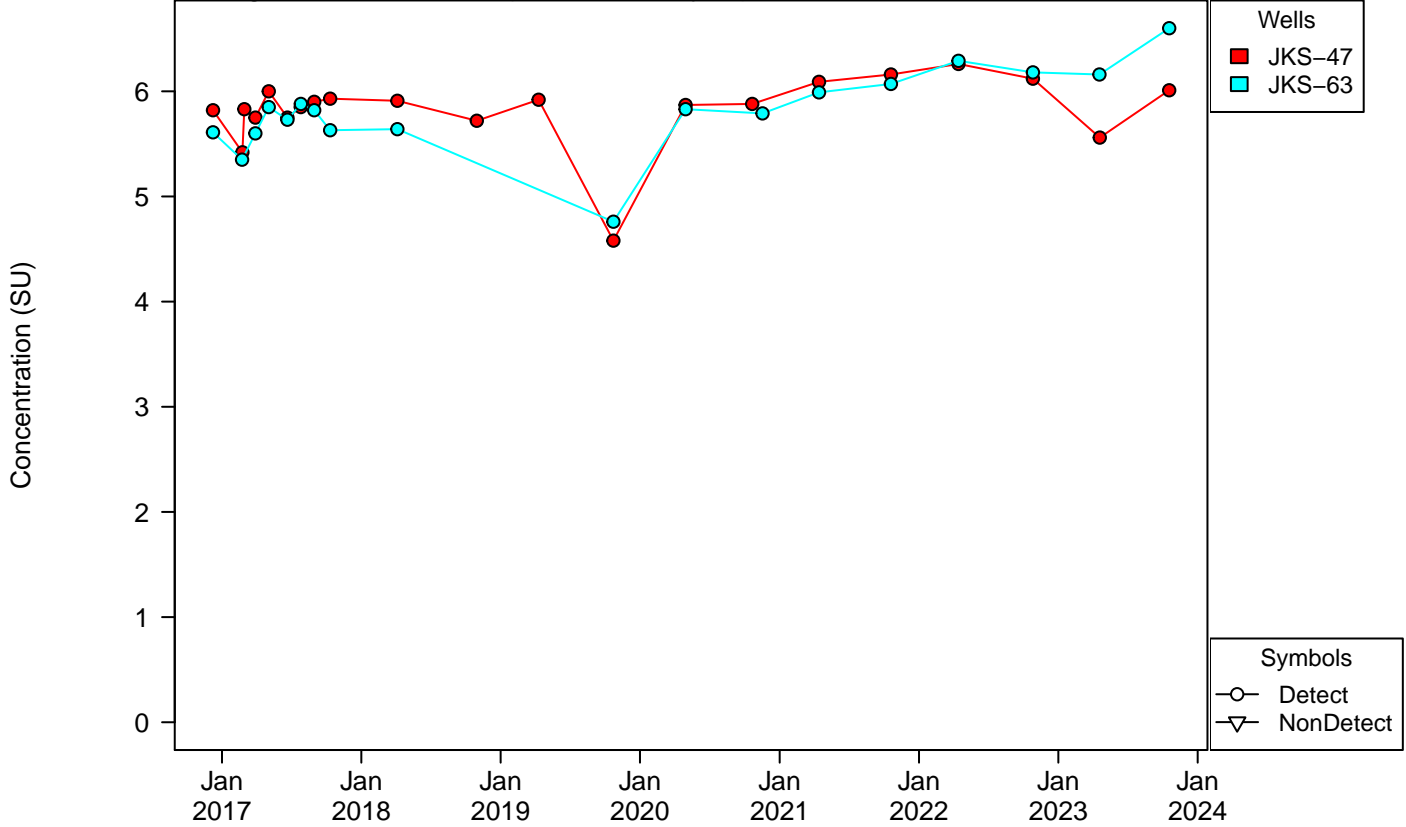


Chemical: Chloride
Significant Difference (Intrawell Analysis)

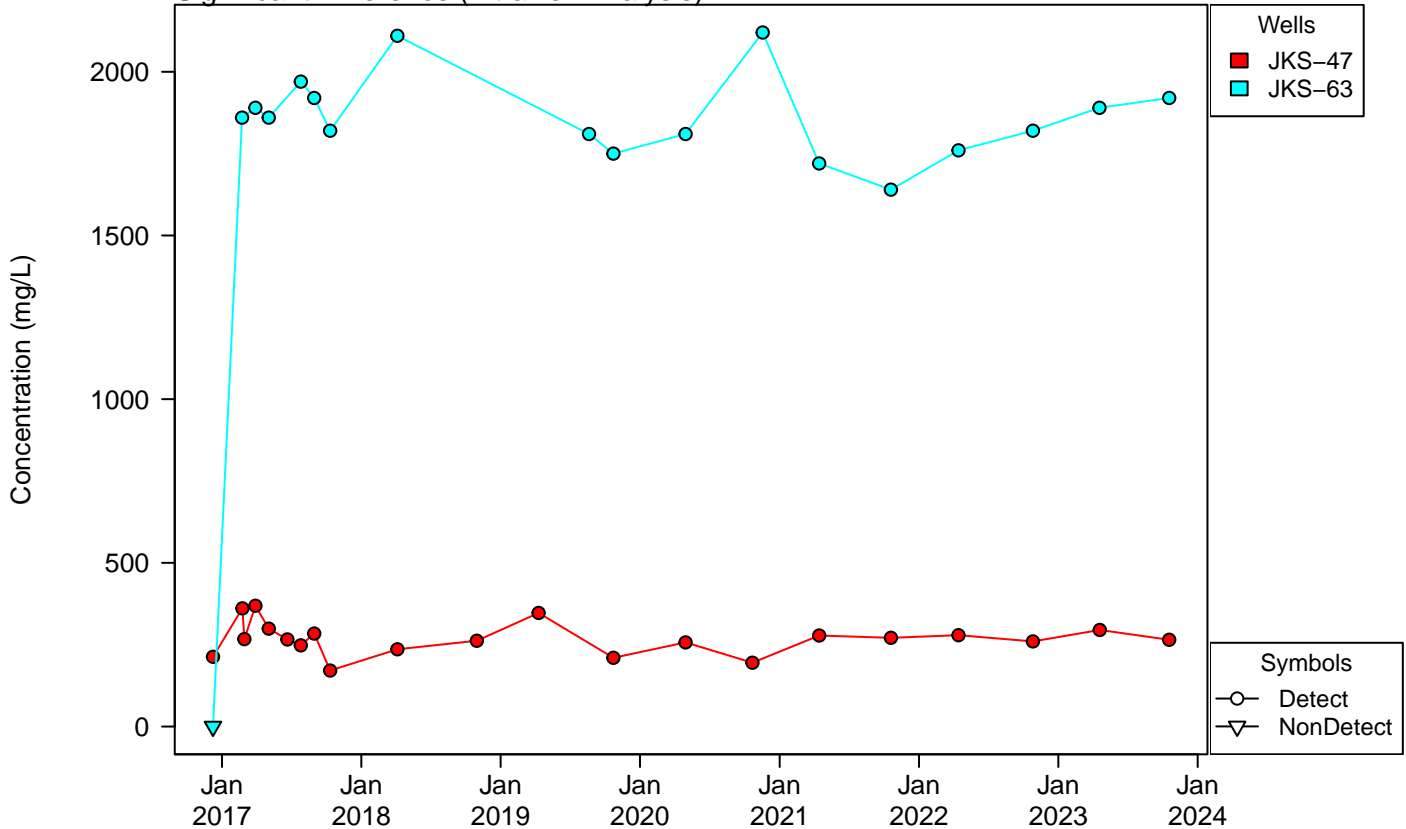


Appendix B – Figure 3
Unit: Evaporation Pond
Timeseries of Upgradient Wells

Chemical: pH
No Significant Difference (Interwell Analysis)

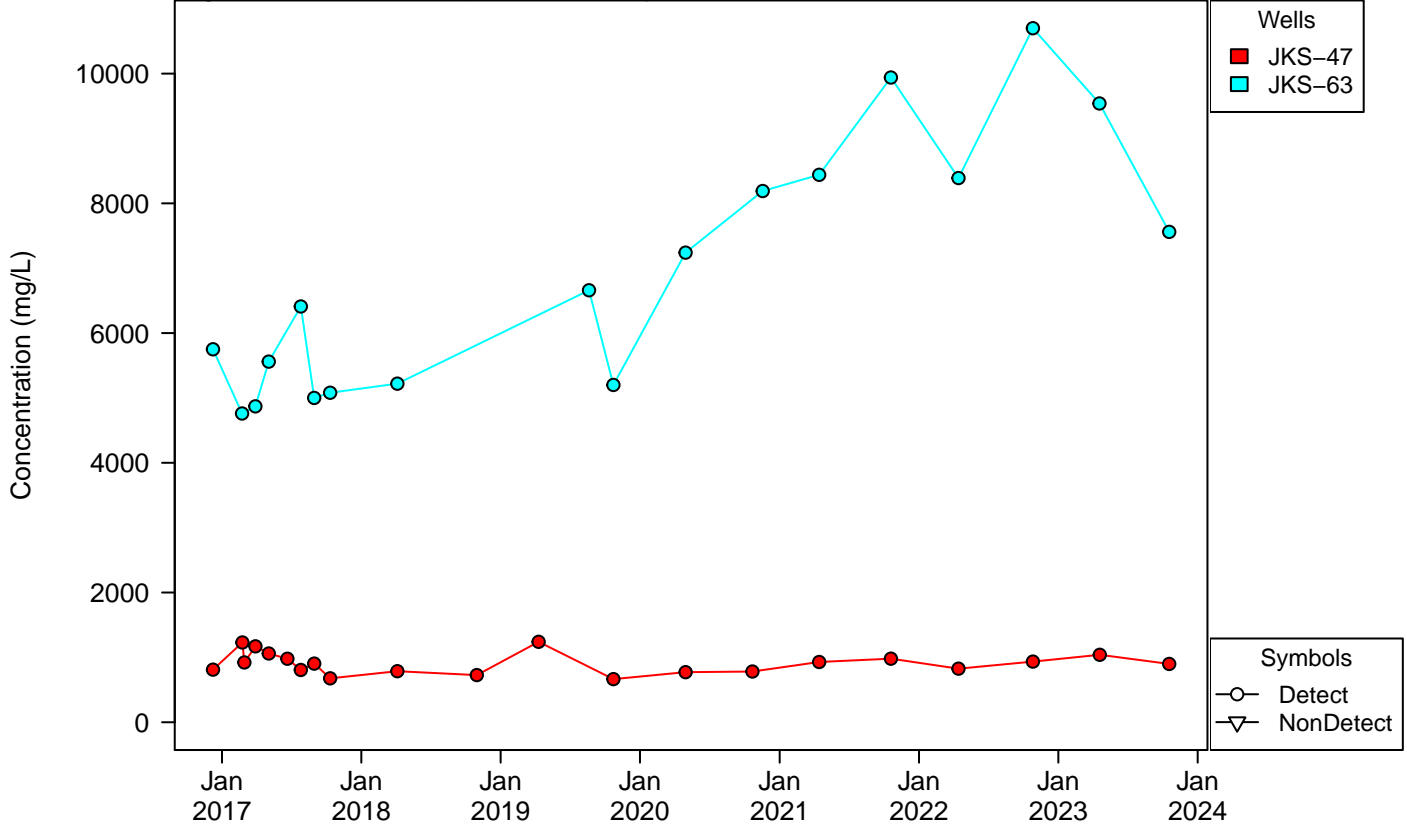


Chemical: Sulfate
Significant Difference (Intrawell Analysis)

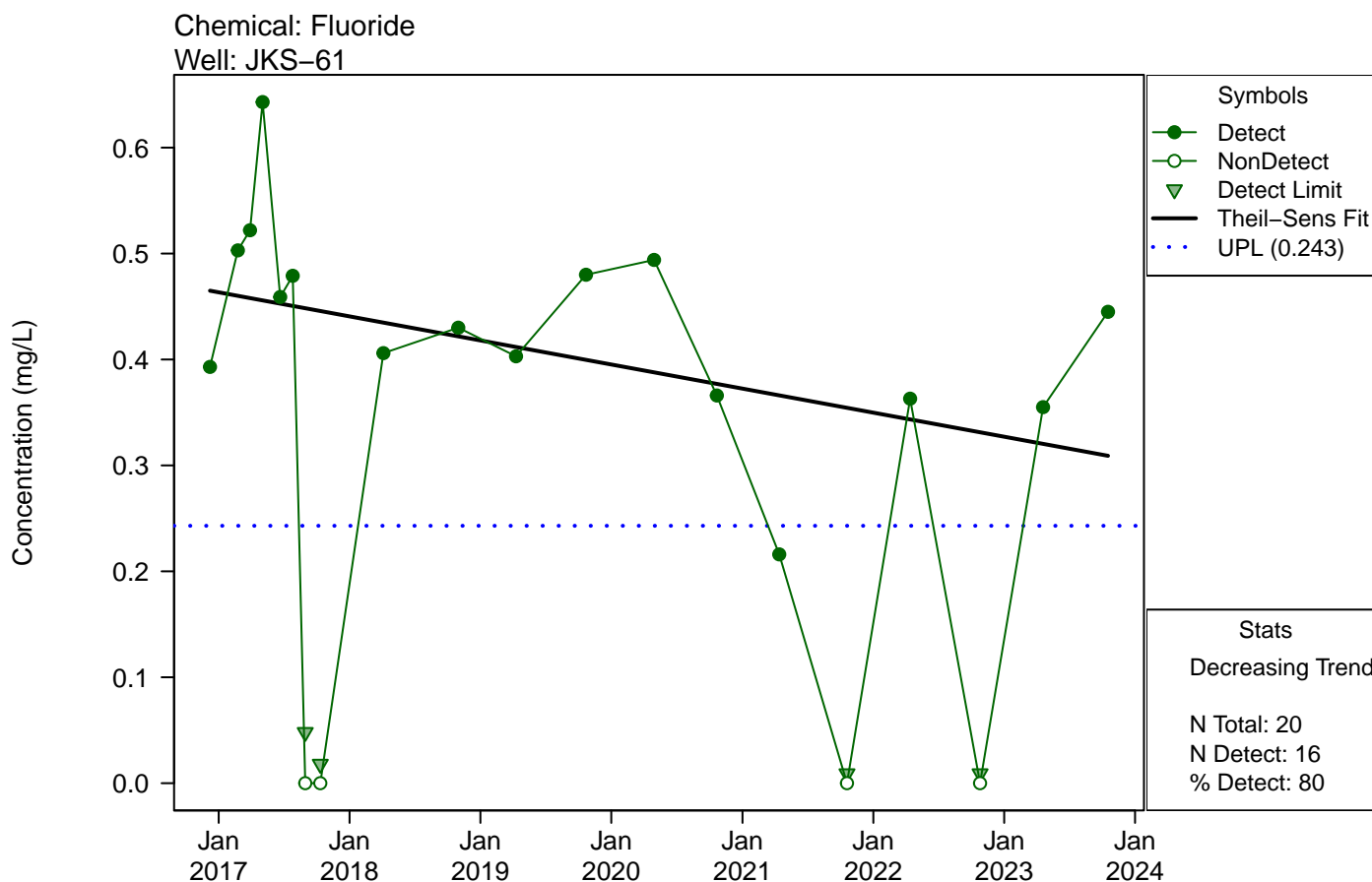
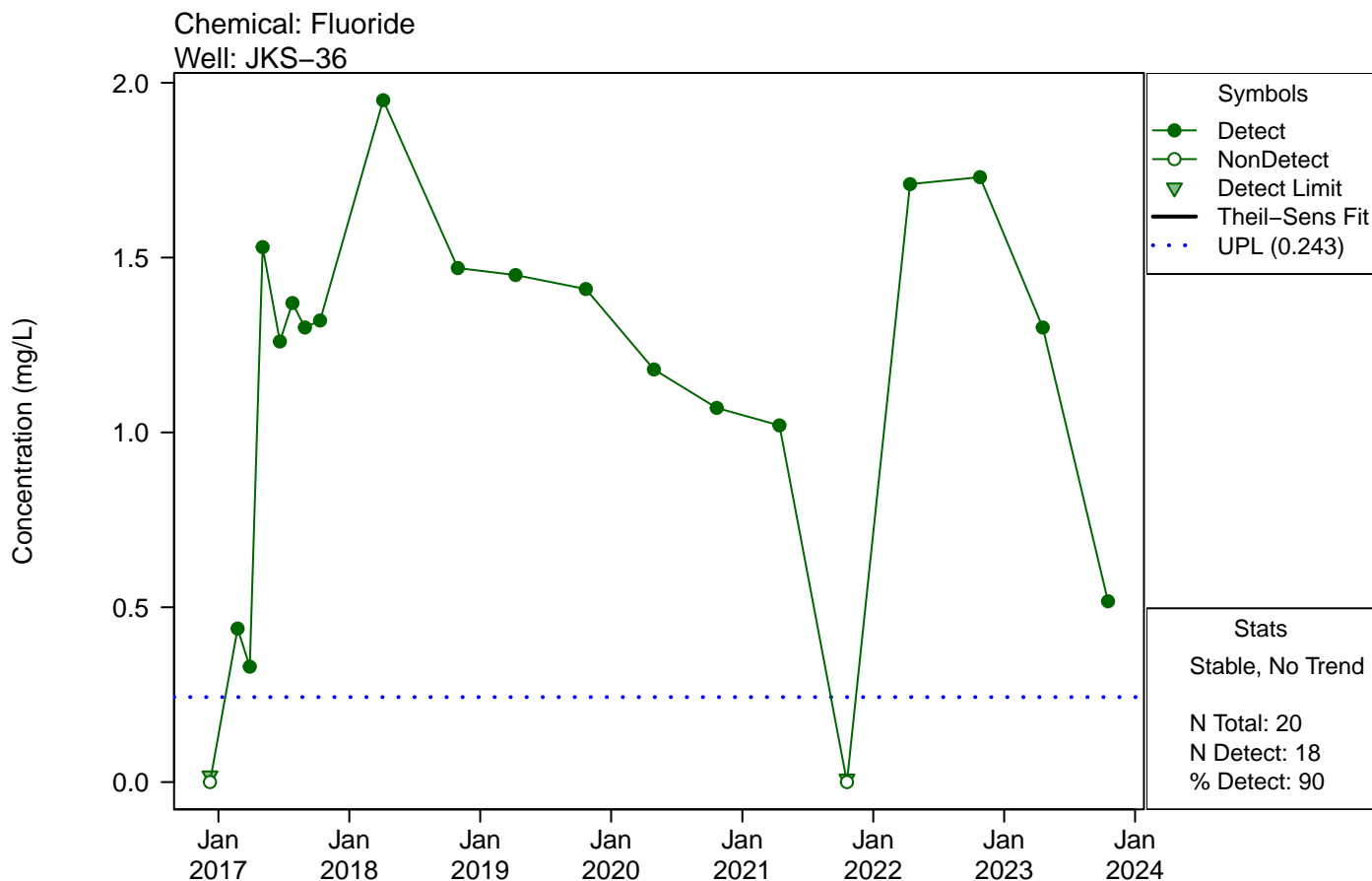


Appendix B – Figure 3
Unit: Evaporation Pond
Timeseries of Upgradient Wells

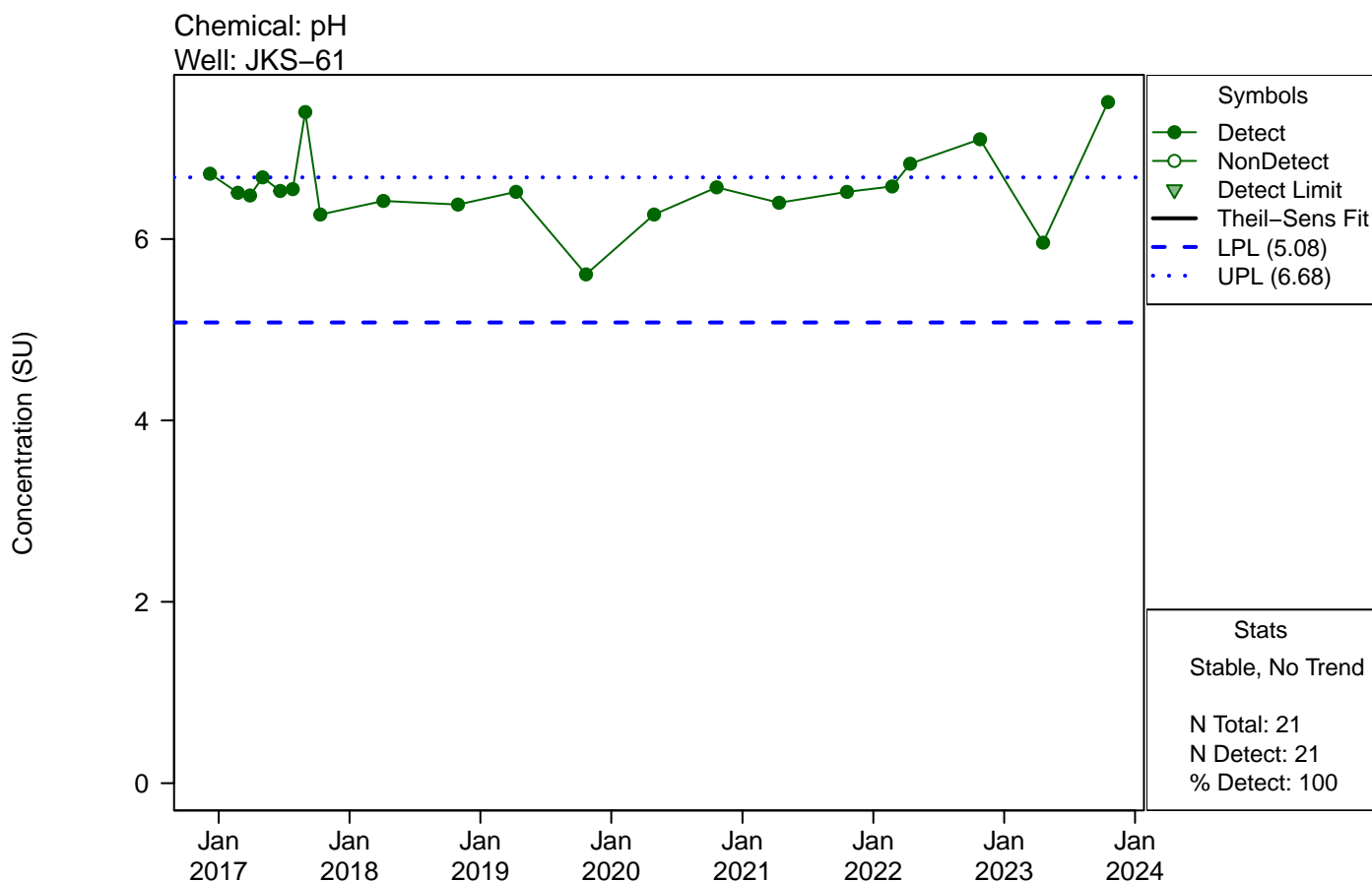
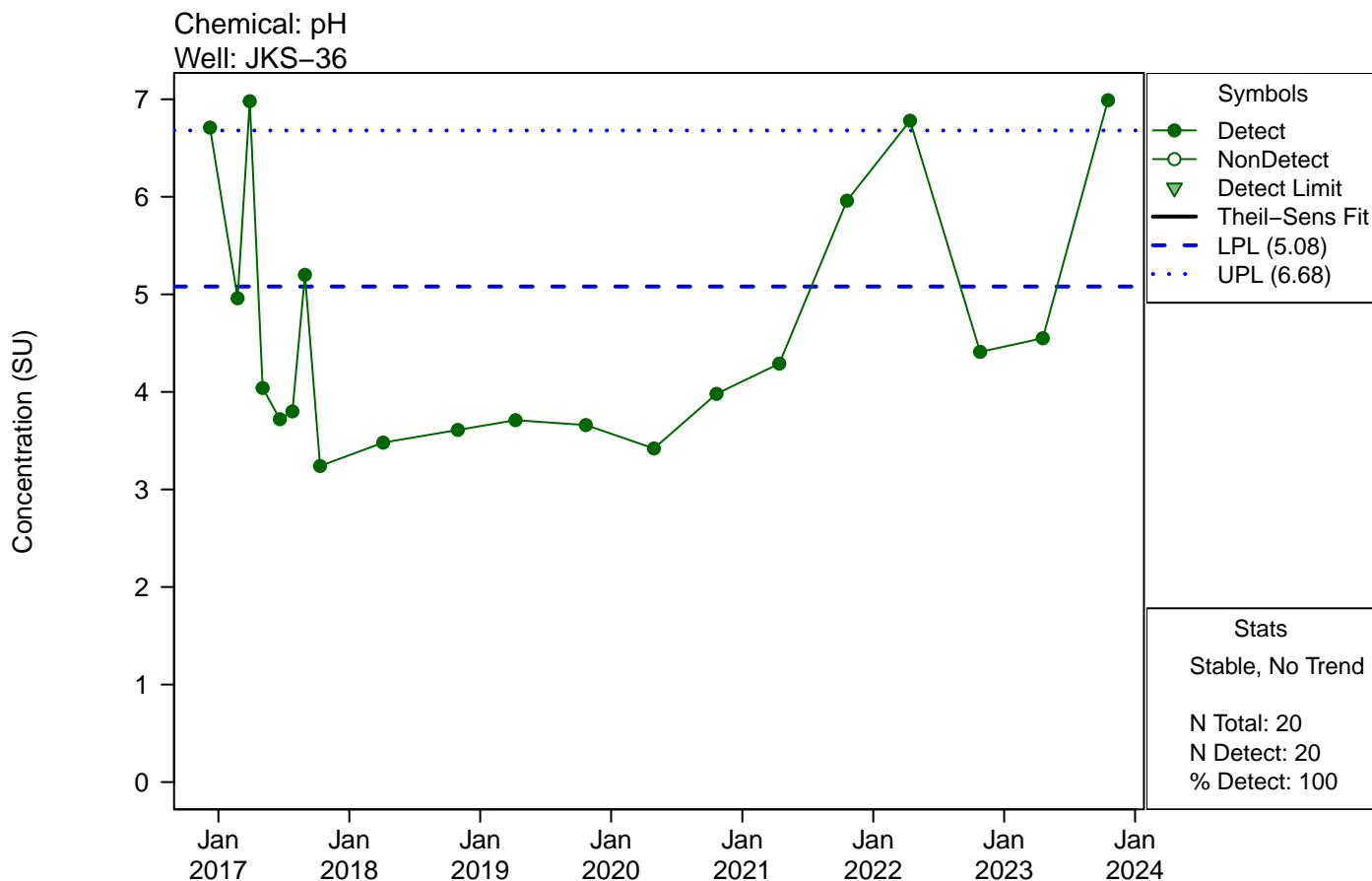
Chemical: TDS
Significant Difference (Intrawell Analysis)



Appendix B – Figure 4
Unit: Evaporation Pond
Trend Analysis of Downgradient Wells with Exceedances



Appendix B – Figure 4
Unit: Evaporation Pond
Trend Analysis of Downgradient Wells with Exceedances





APPENDIX C APRIL 2023 GROUNDWATER SAMPLING RESULTS

JANUARY 2024



August 31, 2023

Mr. Michael Malone
CPS Energy
500 McCullough Avenue
San Antonio, Texas 78215

Reference: 0681818

Subject: April 2023 Groundwater Sampling Event
Calaveras Power Station CCR Units
San Antonio, Texas

Introduction

Title 40 Code of Federal Regulations, Part 257, (40 CFR §257) Subpart D [a.k.a. Coal Combustion Residual (CCR) Rule] was published in the Federal Register in April 2015 and became effective in October 2015. Additionally, Title 30, Texas Administrative Code, Chapter 352 (30 TAC 352) (a.k.a. Texas CCR Rule), became effective in May 2020. One of the many requirements of the Federal and Texas CCR Rule was for CPS Energy to determine if there are impacts to groundwater from the surface impoundments [Evaporation Pond (EP), Bottom Ash Ponds (BAPs), and Sludge Recycling Holding Pond (SRHP)] and the landfill [Fly Ash Landfill (FAL)] that contain CCR at the Calaveras Power Station.

In the initial *2017 Annual Groundwater Monitoring and Corrective Action Report* for each CCR unit, the downgradient monitoring well results from the October 2016 sampling event were compared to Upper Prediction Limits (UPLs) and Lower Prediction Limits (LPLs). UPLs and LPLs were calculated in the *Annual Groundwater Monitoring and Corrective Action Reports* for the purpose of determining a potential statistically significant increase (SSI) over background levels. In the subsequent *Annual Groundwater Monitoring and Corrective Action Reports* for each CCR unit, the downgradient monitoring well results from the previous October sampling events were compared to updated UPLs and LPLs. These updated UPLs and LPLs were recalculated in the respective *Annual Groundwater Monitoring and Corrective Action Reports* using the additional data collected from the previous year. The April 2023 groundwater sample results were compared to the updated UPLs and LPLs and the evaluations of the sample results indicated a potential SSI for a limited number of constituents from the EP, FAL, and BAPs. No potential SSIs were identified for any constituents from the SRH Pond.

According to the Federal CCR Rule [40 CFR §257.94(e)] and Texas CCR Rule [30 TAC §352.941(c)], if the owner or operator of a CCR unit determines there is a SSI over background levels for one or more Appendix III constituents, the owner or operator may demonstrate that a source other than the CCR unit caused the SSI over background levels or that the SSI resulted from error in sampling, analysis, statistical evaluation or natural variation in groundwater quality. The CCR Rule also indicates that the owner or operator must complete the written demonstration within 90 days of detecting a SSI over the background levels. If a successful demonstration is

completed within the 90-day period, the owner or operator may continue with a detection monitoring program.

To address the potential SSIs identified in the previous *Annual Groundwater Monitoring and Corrective Action Reports*, CPS Energy prepared six *Written Demonstrations – Responses to Potential Statistically Significant Increases*¹ (dated 4 April 2018; 27 February 2019; 27 April 2020; 18 June 2021; 26 April 2022; and 31 May 2023). Based on the evidence provided in the *Written/ Alternative Source Demonstrations*, no SSIs over background levels were determined for any of the CPS Energy CCR units (EP, FAL, BAPs, and SRHP) and therefore, CPS Energy continued with a detection monitoring program that would include semiannual sampling.

Sampling Events Summary

The first semiannual groundwater sampling event for 2023 was conducted on April 18 and 19, 2023. The sampling event included the collection of water level measurements and groundwater samples from all the background and downgradient monitoring wells in the CCR monitoring program. Monitoring wells were gauged and then sampled by CPS Energy using low flow sampling techniques during the sampling event. The groundwater samples were analyzed for Appendix III constituents.

For each CCR unit, the downgradient monitoring well results from the April 2023 sampling event was compared to the updated UPLs and LPLs recalculated in their respective *2022 Annual Groundwater Monitoring and Corrective Action Report*. The April 2023 groundwater sample results for the downgradient monitoring wells in each CCR unit are summarized in Attachment 1.

Although the evaluations of the April 2023 groundwater sample results indicate potential SSIs for a limited number of constituents, the constituents associated with the potential SSIs are the same constituents, were detected at similar concentrations and were identified in one or all of the previous *Written/ Alternative Source Demonstrations*. The evaluations of the April 2023 groundwater sample results with potential SSIs are summarized below.

EP – The constituents associated with potential SSIs include fluoride in JKS-36 and JKS-61; and pH in JKS-36. As previously presented in the *Written/ Alternative Source Demonstrations*, the concentrations of fluoride and pH appear to reflect natural variation in groundwater quality in the vicinity of the CCR unit. The reported April 2023 concentrations were within the range of naturally occurring concentrations identified in the *Written/ Alternative Source Demonstrations*.

FAL – The constituents associated with potential SSIs include pH in JKS-31 and JKS-46. As previously presented in the *Written/ Alternative Source Demonstrations*, the concentration of pH in JKS-31 appears to reflect natural variation in groundwater quality in the vicinity of the CCR unit. The concentration of pH in JKS-46 is slightly higher than the naturally occurring range previously detected at this monitor well; however, the detected concentration is within historical ranges of naturally occurring pH values detected at JKS-36, JKS-40, and JKS-43 located in the vicinity of the

¹ The term 'Written Demonstration' was historically used for a document that provided responses to potential SSIs. Starting with the 26 April 2022 document, the term 'Alternative Source Demonstration' was used for these types of documents.

Northern CCR Units. The reported April 2023 concentrations were within the range of naturally occurring concentrations identified in the *Written/ Alternative Source Demonstrations*.

BAPs – The constituents associated with potential SSIs include boron in JKS-48, JKS-49, JKS-50R, JKS-52, JKS-55, and JKS-56; and fluoride in JKS-48, JKS-52, and JKS-55. As previously presented in the *Written/ Alternative Source Demonstrations*, the concentrations of boron and fluoride appear to reflect natural variation in groundwater quality in the vicinity of the CCR unit. The reported April 2023 concentrations were within the range of naturally occurring concentrations identified in the *Written/ Alternative Source Demonstrations*.

SRHP – The constituents associated with potential SSIs include boron in JKS-52, JKS-53, and JKS-54; and fluoride in JKS-52 and JKS-54. As previously presented in the *Written/ Alternative Source Demonstrations*, the concentrations of boron and fluoride appear to reflect natural variation in groundwater quality in the vicinity of the CCR unit. The reported April 2023 concentrations were within the range of naturally occurring concentrations identified in the *Written/ Alternative Source Demonstrations*.

Note: As discussed in the *2022 Annual Groundwater Monitoring and Corrective Action Reports* for the BAPs and SRHP, the groundwater monitoring well network was revised to designate newly installed well JKS-70 as an upgradient well. In addition, for the BAPs, JKS-49 was redesignated from an upgradient well to a downgradient well. Therefore, starting with the 2022 monitoring events, all statistical analyses (including the establishment of UPLs, LPLs and potential exceedances) were conducted using an upgradient monitoring well network comprised of JKS-51 and JKS-70. Further noted in the *Reports*, JKS-70 was only sampled during one event in 2022, and the incorporation of those analytical results into the statistical analyses have resulted in lower UPLs, and therefore the potential for additional exceedances. CPS Energy will continue to collect additional sample results from JKS-70 to better assess and evaluate these potential exceedances.

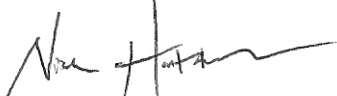
Conclusions

Based on the April 2023 groundwater sample results and the evidence provided in one or all of the *Written/ Alternative Source Demonstrations*, no SSIs over background levels have been determined for any of the CPS Energy CCR units (EP, FAL, BAPs, and SRHP) and therefore, CPS Energy should continue with a detection monitoring program. The second semiannual sampling event should be performed in October 2023.

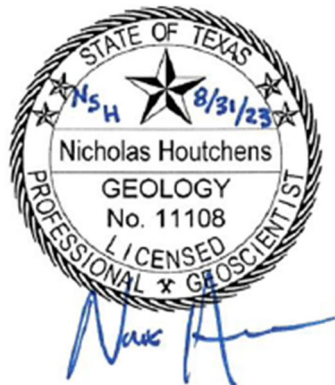
We appreciate the opportunity to work with you on this project. Please contact me if you should have any questions.

Sincerely,

Environmental Resources Management Southwest, Inc.



Nicholas Houtchens
Senior Geologist



ATTACHMENT 1

APRIL 2023 GROUNDWATER SAMPLE RESULTS

April 2023 Groundwater Sample Results
CCR Unit: Evaporation Pond
CPS Energy Calaveras Power Station
San Antonio, TX

				CCR Unit	EP	EP	EP	EP
				Well Designation	Downgradient	Downgradient	Downgradient	Downgradient
				Well ID	JKS-36	JKS-61	JKS-62	JKS-64
				Sample Date	4/18/2023	4/19/2023	4/19/2023	4/19/2023
				Sample Type Code	N	N	N	N
Constituent	Units	2022 LPL - EP	2022 UPL - EP					
Boron	mg/L	--	1.67		0.415	1.06	NS	0.683
Calcium	mg/L	--	1,480		166	71.2	NS	21.6
Chloride	mg/L	--	3,420		341	150	NS	19.2
Fluoride	mg/L	--	0.252		1.30	0.355	NS	0.107
pH, Field	SU	4.94	6.51		4.55	5.96	NS	5.51
Sulfate	mg/L	--	2,100		950	331	NS	212
Total Dissolved Solids	mg/L	--	10,500		2,020	1,090	NS	574

NOTES:

Shaded results either exceed of the Upper Prediction Limit (UPL) or are below the Lower Prediction Limit (LPL) for this CCR unit.

Sample Type Code: N - Normal

NS: Not sampled (well blockage or limited water in well column)

April 2023 Groundwater Sample Results
CCR Unit: Fly Ash Landfill
CPS Energy Calaveras Power Station
San Antonio, TX

				FAL	FAL	FAL	FAL	FAL
				Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
				JKS-31	JKS-33	JKS-33	JKS-46	JKS-60
				4/18/2023	4/19/2023	4/19/2023	4/18/2023	4/19/2023
				N	N	FD	N	N
Constituent	Units	2022 LPL - FAL	2022 UPL - FAL					
Boron	mg/L	--	5.16	0.442	0.988	0.996	0.425	0.579
Calcium	mg/L	--	948	205	376	386	91.4	358
Chloride	mg/L	--	5,300	389	732	752	46.2	287
Fluoride	mg/L	--	4.46	0.706	1.05	1.05	1.07	0.218
pH, Field	SU	4.98	7.10	4.71	5.75	5.75	3.88	5.77
Sulfate	mg/L	--	8,600	1,070	1,550	1,600	766	1,220
Total Dissolved Solids	mg/L	--	20,500	2,120	3,680	3,630	1,120	2,310

NOTES:

Shaded results either exceed of the Upper Prediction Limit (UPL) or are below the Lower Prediction Limit (LPL) for this CCR unit.

Sample Type Code: N - Normal; FD - Field Duplicate

April 2023 Groundwater Sample Results
CCR Unit: Bottom Ash Ponds
CPS Energy Calaveras Power Station
San Antonio, TX

CCR Unit				BAP	BAP	BAP	BAP	BAP	BAP	BAP
Well Designation				Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient	Downgradient
Well ID				JKS-48	JKS-48	JKS-49	JKS-50R	JKS-52	JKS-55	JKS-56
Sample Date				4/19/2023	4/19/2023	4/18/2023	4/18/2023	4/19/2023	4/18/2023	4/19/2023
Sample Type Code				N	FD	N	N	N	N	N
Constituent	Units	2022 LPL - BAP	2022 UPL - BAP							
Boron	mg/L	--	0.726	1.93	1.97	2.24	5.15	2.47	0.794	2.86
Calcium	mg/L	--	404	118	120	106	119	179	126	92.0
Chloride	mg/L	--	658	434	470	404	84.8	412	406	138
Fluoride	mg/L	--	0.547	0.964	0.975	0.289	0.310	0.626	0.844	0.398
pH, Field	SU	5.48	7.16	6.72	6.72	7.16	6.60	6.74	6.80	6.68
Sulfate	mg/L	--	625	182	197	202	171	256	173	39.8
Total Dissolved Solids	mg/L	--	3,180	1,370	1,400	1,380	1,030	1,650	1,380	791

NOTES:

Shaded results either exceed of the Upper Prediction Limit (UPL) or are below the Lower Prediction Limit (LPL) for this CCR unit.

Sample Type Code: N - Normal; FD - Field Duplicate

April 2023 Groundwater Sample Results
CCR Unit: SRH Pond
CPS Energy Calaveras Power Station
San Antonio, TX

				CCR Unit	SRH Pond	SRH Pond	SRH Pond
				Well Designation	Downgradient	Downgradient	Downgradient
				Well ID	JKS-52	JKS-53	JKS-54
				Sample Date	4/19/2023	4/19/2023	4/19/2023
				Sample Type Code	N	N	N
Constituent	Units	2022 LPL - SRH	2022 UPL - SRH				
Boron	mg/L	--	0.726		2.47	1.72	1.07
Calcium	mg/L	--	404		179	140	144
Chloride	mg/L	--	658		412	450	440
Fluoride	mg/L	--	0.547		0.626	0.345	0.635
pH, Field	SU	5.48	7.16		6.74	6.52	6.60
Sulfate	mg/L	--	616		256	312	437
Total Dissolved Solids	mg/L	--	3,180		1,650	1,580	1,570

NOTES:

Shaded results either exceed of the Upper Prediction Limit (UPL) or are below the Lower Prediction Limit (LPL) for this CCR unit.
Sample Type Code: N - Normal; FD - Field Duplicate



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